



REGION 9

SAN FRANCISCO, CA 94105

Sent via E-Mail: russell.smith@desotec.com

Russell Smith
Plant Manager
Desotec US LLC
2523 Mutahar Street
Parker, AZ 85344

Dear Plant Manager Smith;

On September 13, 2023, a representative of the U.S. Environmental Protection Agency (EPA) conducted an announced compliance evaluation inspection (CEI) of Desotec US LLC (Desotec) in Parker, AZ with EPA ID# AZD982441263. The purpose of the inspection was to determine Desotec's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279.

A copy of the inspection report is enclosed for your information. The report describes conditions at Desotec at the time of the inspection. No potential violations were identified during the inspection. Please note that omissions in the RCRA CEI report shall not be construed as a determination of compliance with any other applicable regulations.

The EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within seven (7) calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

If you have any questions regarding this letter, please contact Jennifer MacArthur of my staff at (415) 972-3994 or at macarthur.jennifer@epa.gov.

Sincerely,

RICHARD
SAKOW

Digitally signed by
RICHARD SAKOW
Date: 2023.11.13
09:59:26 -08'00'

Rick Sakow
Manager, Hazardous Waste & Chemicals Section
Enforcement & Compliance Assurance Division

ENCLOSURE

cc (w/out enclosure):

Guthrie Dick, CRIT EPO (guthrie.dick@crit-nsn.gov)

Christopher Martinez, CRIT EPO (Christopher.Martinez@crit-nsn.gov)

Josephina Rivera, CRIT EPO (Josephina.Rivera@crit-nsn.gov)

Amelia Flores, CRIT (Amelia.Flores@crit-nsn.gov)

Rebecca Loudbear, CRIT DOJ (rloudbear@critdoj.com)



Region 9 Enforcement and Compliance Assurance Division
75 Hawthorne Street
San Francisco, CA 94105
RCRA INSPECTION REPORT

Inspection Date(s):	9/13/2023	Inspection Announced: Yes
Time:	Entry: 8:00 am	
Regulatory Program(s)	RCRA Subtitle C (Hazardous Waste)	
Company Name:	Desotec US LLC (formerly Evoqua Water Technologies)	
Facility/Site Physical Location:	2523 Mutahar Street	
(city, state, zip code)	Parker, AZ 85344	
Geographic Coordinates:	34.13249, -114.27262	
County	La Paz	
Facility/Site Contact:	Russell Smith	Plant Manager
	Russell.smith@evoqua.com	(928) 669-5758 ext. 17
Facility/Site Identifier:	AZD982441263	
Generator Status	Permitted Treatment, Storage & Disposal Facility Large Quantity Generator	
NAICS:	562211 – Hazardous Waste Treatment & Disposal	
Facility/Site Personnel Participating in Inspection:		
Russell Smith	Desotec US LLC	Plant Manager
Chelsea Murphy	Desotec US LLC	EHS Professional
Margaret Jefferson	Desotec US LLC	Carbon Expert Specialist
Additional Person(s) Participating in Inspection:		
Christopher Martinez	Colorado River Indian Tribe	Solid Waste Inspector
	Christopher.Martinez@crit-nsn.gov	(928) 662-4336
Andrew Chew	USEPA Region 9	CAA Inspector
Ethan Hessel	USEPA Region 9	CAA Inspector in Training
Trevor McCollough	USEPA Region 9	CAA Inspector in Training
Connie Hernandez	USEPA Region 9	CAA Inspector in Training
Inspector(s):		
Jennifer MacArthur	MacArthur, Jennifer	Digitally signed by MacArthur, Jennifer Date: 2023.11.07 10:34:45 -08'00'
	US EPA Region 9, ENF-2-2	RCRA Inspector
	macarthur.jennifer@epa.gov	(415) 972-3994
Peer Review:		
Dan Fernandez	Daniel Fernandez	Digitally signed by Daniel Fernandez Date: 2023.11.09 09:54:35 -08'00'
	USEPA Region 9, ENF-2-2	RCRA Inspector
	fernandez.daniel@epa.gov	(415) 972-3299

Supervisor Review:		
Rick Sakow	RICHARD SAKOW	Digitally signed by RICHARD SAKOW Date: 2023.11.13 09:58:39 -08'00'
	US EPA Region 9, ENF-2-2	Manager, Hazardous Waste & Chemicals Section
	sakow.rick@epa.gov	(415) 972-3495

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine Desotec US LLC's (Desotec) compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279 and the provisions in their final RCRA permit.

Pre-Inspection

EPA announced the inspection on September 11, 2023, via email and voicemail to Desotec's Plant Manager, Russell Smith. I provided the facility with a list of records that I would review at the time of the inspection.

Opening Conference

I arrived at the Desotec facility in Parker, AZ at 8:00 am on September 13, 2023. Christopher Martinez, a Solid Waste Inspector with the Colorado River Indian Tribe (CRIT) Environmental Protection Office (EPO), was in attendance. In addition, EPA Clean Air Act (CAA) Inspector, Andrew Chew, and CAA Inspectors in Training, Ethan Hessler, Trevor McAuliffe and Connie Hernandez, were also in attendance.

We met with Russell Smith, Plant Manager, Chelsea Murphy, EHS Professional, and Margaret Jefferson, Carbon Expert Specialist, in the opening conference of the inspection. I presented my credentials to the Desotec facility representatives and informed them that this was an EPA inspection to determine Desotec's compliance with RCRA regulations, including air emissions standards and the conditions in their RCRA permit.

Facility/Site Description

Below is a Google Earth aerial view of the Desotec facility in Parker, AZ.



The Desotec facility is located on the CRIT reservation. The facility has 15 employees, operates 24 hours a day seven days a week and has been in its current location since 1992.

Desotec regenerates spent carbon for reuse and is a permitted treatment storage and disposal facility (TSDF) and large quantity generator (LQG) of hazardous waste. The spent carbon is trucked to the Desotec facility in several kinds of containers (e.g., drums, vessels, supersacks, roll-off bins, etc.) or in tanker trucks. The spent carbon typically contains benzene or other volatile organic compounds (VOCs). Only a portion (approximately 30%) of the incoming spent carbon received at Desotec is classified as a hazardous waste when received. A substantial quantity of the incoming spent carbon is not classified as hazardous waste upon receipt, typically because it does not exhibit a characteristic and is not listed, or it is a characteristic sludge destined for reclamation. The spent carbon is either introduced to the carbon regeneration system at the Facility upon receipt via one of two hoppers (H-1 or H-2) or it is moved to the Container Storage Area to be put in the hoppers later. The spent carbon is transferred from the hoppers to one of four Spent Carbon Storage Tanks (T-1, T-2, T-5, or T-6). During the transfer, water is added to the spent carbon, creating a slurry, to help in pumping the spent carbon from the hoppers to the storage tanks. From the storage tanks, the spent carbon is transferred in slurry form to the furnace Feed Tank (T-18). The spent carbon in its slurry form then is sent from T-18 through a dewatering screw where the carbon is dewatered. The dewatered carbon is then fed to the weigh belt where it is weighed and sampled before it is fed to the operating Carbon Regeneration Furnace (RF-2). The regenerated carbon is cooled in a cooling screw and is then sent to the product storage area for commercial packaging. Wastewater is processed through a wastewater treatment system and is discharged to the local publicly owned treatment works pursuant to a Clean Water Act discharge permit issued by the Colorado River Sewer Systems Joint Venture.

Some of the equipment at Desotec is subject to RCRA air emissions regulations. The facility is not subject to Subpart AA as there are no process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping. Desotec is subject to Subpart BB (air emissions standards for equipment leaks) and Subpart CC (air emissions standards for tank, surface impoundments and containers). Subparts BB and CC allow for compliance to be demonstrated through adherence to Clean Air Act (CAA) requirements in 40 CFR Parts 60, 61 and/or 63 (see 40 CFR §264.1064(m)). Desotec is subject to the National Emission Standards (NESHAP) for Benzene Waste, codified at 40 CFR Part 61, Subpart FF. Desotec's permit includes compliance plans for Subparts BB, CC and FF. The final Desotec RCRA permit and supporting documents can be found on EPA's Desotec Website: <https://www.epa.gov/az/desotec-us-llc-formerly-evoqua-water-technologies-llc-parker-az>.

Wastes generated by Desotec include spent carbon, spent carbon placed in tanks for regeneration, wastewater from air scrubber blowdown, filter cake from wastewater treatment and hazardous debris. Other regulated wastes include universal waste lamps, universal waste batteries, and used oil. USEPA last inspected Desotec in June 2021. No potential violations were noted in RCRAInfo.

SECTION II – OBSERVATIONS AND AREAS OF CONCERN

The on-site inspection portion of the CEI started in the Main Office and proceeded to the Product Storage Area, Warehouse 1 (hazardous waste storage, non-hazardous waste storage and satellite accumulation areas (SAAs)), Hoppers 1 and 2, Storage Tank Farm Area, Thermal Treatment Unit Area, Debris Storage Bin, Wastewater Treatment and Filter Press Area, Facility Control Room, Warehouse 2 (non-hazardous waste storage area), Universal Waste Storage Room and ended back at the Main Office.

No areas of concern were identified during the facility walkthrough.

Records Review

I reviewed the following documents either during or subsequent to the on-site inspection:

- EPA's September 2018 Final RCRA Permit and Attachments;
- Desotec's Waste Analysis Plan;
- Financial Assurance Documents (Guarantee Bond);
- Annual Refresher Training Documents;
- Training Plan;
- Contingency Plan;

- Annual Method 21 Testing and Inspection Records;
- Quarterly Benzene NESHAP Inspection Logs;
- Carbon Canister Replacement Log for Air Pollution Control Devices;
- Startup/Shutdown/Malfunction Report;
- Performance Demonstration Test (PDT) for RF-2 (Subpart X Thermal Treatment Unit);
- Annual Ultrasonic Thickness Testing Report for Hazardous Waste Tanks;
- TVA Calibration Records;
- NOx Emissions Calculations;
- Weekly and Daily Inspection Logs;
- Hazardous Waste Manifests and Land Disposal Restriction (LDR) Forms;
- Incoming Waste Logs.

No areas of concern were noted during the records review.

Closing Conference

I conveyed preliminary inspection findings to the facility representatives and concluded the inspection at approximately 1:00 pm.