



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

Purpose: Focused RCRA Subtitle C Compliance Evaluation

Date of Evaluation: March 6<sup>th</sup> and 7<sup>th</sup>, 2003

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AZD982441263

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## **Purpose of Inspection**

On March 6 and 7, 2003, representatives of the United States Environmental Protection Agency (USEPA) performed a focused compliance evaluation inspection (CEI). The purpose of the evaluation was to further document in detail the condition of the secondary containment pad in the hazardous waste storage tank/furnace, loading/unloading and hopper areas. Cracks and gaps in the pad in the secondary containment area were noted during the inspections of June 2001, January 2002 and August 2002.

## **A. Pad Repair Test Activities**

### **1. Activities in the Hopper and Hazardous Waste Storage Tank/Furnace Area**

At the time of the inspection, EPA inspectors observed a facility employee using a machine called a “scabblor” in the area near the hopper. The Plant Manager explained that the “scabblor” was used to remove the previously applied Sikadur used to fill in cracks and gaps. For the past four to five months, a test of materials and methodology for pad repair has been in progress. The material being tested is called “polyurea” (MSDS Attachment #1). Polyurea was selected due to its pliability which could result in the material being able to withstand temperature changes. This is a two part substance used to fill crack and gap areas. The material is applied using a double barrel apparatus that resembles a caulking gun. (Photo # 1)

An area near the hazardous waste storage tank/furnace area was being used as a test area. The Plant Manager explained the process. The scabblor (Photo # 2) is used to remove the previously applied repair media. A surface grinder (Photo # 4) then prepares the area by scoring the concrete around the portion to be repaired in order facilitate bonding of the material applied subsequently. After removing the old “sealant” and scoring the section, 20 mesh silica sand would be placed in the below grade crevice. The polyurea would be applied over the sand. (See Photo #s 3, 5, and 6)

## **B. Condition of Secondary Containment Areas**

### **1. Observations of the Containment Pads in the Hazardous Waste Storage Tank/Furnace Area, Hopper and Loading/Unloading Areas**

#### *Containment, Hazardous Waste Storage Tank/Furnace Area*

In order to document the condition of the containment pad in the hazardous waste storage tank/furnace area, EPA inspectors drew the approximate location and length of each crack observed onto a diagram (Attachment #2 ). The diagram showed the outlines of the support

structures for the tanks and RF-1 and RF-2. Large 'Post-its' with numbers were placed near each crack and a photograph was taken. In the hazardous waste storage tank/furnace area, 160 cracks were mapped and photographed. A copy of the digital photos was provided to facility representatives at the time of the inspection. Facility representatives also photocopied the large format diagram used to map the cracks and gaps. The CRIT representative was also provided with a copy of the diagram.

#### Hopper and Loading/Unloading Area

EPA inspectors generally followed the methodology described above. The cracks in these areas were drawn onto the diagram. However, in these areas, the cracks were not numbered and only general area photos were taken.

#### **Finding of Potential Violation - Continuing Condition 40 CFR§265.193(e)(1)(iii)**

Based upon the observations of the EPA inspectors during the March 2003 inspection, there was no improvement in the condition of the secondary containment pad. EPA's reports for inspections conducted in June 2001; January 2002, and August 2002 cited the potential violation of 40 CFR§265.193(e)(1)(iii). "(e) In addition to the requirements of paragraphs (b),(c) and (d) of this section, secondary containment systems must satisfy the following requirements:(1) External liner systems must be: .....(iii) Free of cracks and gaps."

#### **Finding of Potential Violation - Continuing Condition 40 CFR§265.15(d)**

The March 5<sup>th</sup> and 6<sup>th</sup> Daily Inspection Checklist forms did not include a notation of observations made and the date and nature of any repairs. EPA's report for the inspection conducted on August 29, 2002 cited a potential violation of 40 CFR§265.15(d). The Daily Inspection Checklists for the March 5<sup>th</sup> and 6<sup>th</sup> daily inspections (Attachment # 3) did not contain a notation recording the presence of cracks and gaps or the incompletely repaired areas of the containment pad. The record did not include information regarding the remedial actions in progress and test project repair activities observed by the EPA inspectors.

#### **C. Facility Engineering Drawings**

The methodology utilized by the EPA inspectors to map and document the cracks in the secondary containment pad provided an opportunity to verify the accuracy of a facility schematic engineering diagram. The diagram was intended to indicate the location of support structures, equipment, sumps and raised concrete sections on the secondary containment pad underlying

equipment. The inspectors noted that certain structures were not indicated in the drawing. All

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the support anchors for the tanks were not included and those that appeared in the drawing were not placed in the proper location on the diagram. A pad underneath P-10 was not shown and the T-11 sump was not correctly indicated. The inspectors recommended that the facility review all engineering diagrams for accuracy and make revisions to those diagrams that were included in any Part B permit submittals.

