



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

**MAY 25 2011**

Certified Mail No. 7007-2560-0001-7660-8300  
Return Receipt Requested

In reply, refer to WST-3

**Transmittal Letter**

Todd Guimond  
EH&S Specialist  
Siemens Water Technologies Corporation  
2523 Mutahar Street  
P.O. Box 3308  
Parker, AZ 85344

Dear Mr. Guimond:

On April 19, 2011, a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) was conducted by an inspector from the United States Environmental Protection Agency (U.S. EPA), accompanied by a representative from the Colorado River Indian Tribes Environmental Protection Office. The purpose of the inspection was to determine the compliance of Siemens Water Technologies Corporation (herein "Siemens" or "the facility") with hazardous waste regulations in 40 Code of Federal Regulations (CFR) Subtitle C.

A copy of the inspection report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation. Any omissions in the report shall not be construed as a determination of compliance with any other applicable regulations.

U.S. EPA regulations governing confidentiality of business information are set forth in 40 CFR Part 2, Subpart B. U.S. EPA routinely provides copies of investigation 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 CFR Part 2). If you believe any of the information contained in the Enclosure or submitted to U.S. EPA in response this letter contains confidential business information, please identify any such information in your response and assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the U.S. EPA determines that the information over which you assert a claim meets the criteria set forth in 40 CFR § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 CFR Part 2, Subpart B. U.S. EPA will construe the failure to furnish a confidentiality claim

within fourteen (14) calendar days from the date of Siemens' receipt this transmittal letter as a waiver of that claim and the information may be made available to the public by the U.S. EPA without further notice [40 CFR § 2.203(a)(2)].

Siemens should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal, State and local environmental requirements. If you have questions related to technical aspects of the inspection report or this letter, please contact Kaoru Morimoto of my staff at (415) 972-3306 or morimoto.kaoru@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy C. Miller', written in a cursive style.

Amy C. Miller, Manager  
RCRA Enforcement Office

Enc:

cc (w/o enclosure): David Harper, Colorado River Indian Tribes Environmental Protection Office



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

**WASTE MANAGEMENT DIVISION  
RCRA ENFORCEMENT OFFICE**

**Purpose:** RCRA Compliance Evaluation Inspection

**Facility:** Siemens Water Technologies Corporation

**Facility Address:** 2523 Mutahar Street  
P.O. Box 3308  
Parker, AZ 85344

**Mailing Address:** Same as above

**EPA ID Number:** AZD 982 441 263

**Date of Investigation:** April 19, 2011

**EPA Representative:** Kaoru Morimoto  
(415) 972-3306  
morimoto.kaoru@epa.gov

**Colorado River Indian Tribes  
Environmental Protection Office  
Representative:** Terry Dock  
Water Quality Specialist  
(928) 662-4336  
Terry.dock@critepo.com

**Facility Representatives:** Monte McCue  
Director, Plant Operations  
(928) 669-5758, ext. 17

Todd Guimond  
EH&S Specialist  
(928) 669-5758, ext. 12

**Report Prepared By:** Kaoru Morimoto

**Date of Report:** May 22, 2011

## **Investigation**

On April 19, 2011, a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) was conducted by an inspector from the United States Environmental Protection Agency (U.S. EPA), accompanied by a representative from The Colorado River Indian Tribes Environmental Protection Office. The purpose of the inspection was to determine the compliance of Siemens Water Technologies Corporation (herein "Siemens" or "the facility") with hazardous waste regulations in 40 Code of Federal Regulations (CFR) Subtitle C.

## **Background**

Employing seventeen people, Siemens is currently operating as an interim status storage and treatment facility and is actively in the process of obtaining a part B permit for their carbon regeneration activities. Detailed information on the facility's processes and operations can be found the current permit application.

Based on the quantities of hazardous wastes generated by the facility's operations, as documented during the inspection, Siemens is still a large quantity generator of hazardous waste.

The previous hazardous waste compliance inspection was conducted by the U.S. EPA on June 22, 2009. Potential violations identified during that inspection included: open and unlabelled containers, evidence of a leak from a product tank, and lack of repair/remedial action information on the weekly inspection log.

## **Site Inspection**

During the in-brief, the facility representatives informed U.S. EPA that minimal operations were ongoing for the last few weeks since the hearths were being re-lined.

### Unloading Area

The unloading area was paved with asphalt. No hazardous wastes were located in this area at the time of the inspection.

### Container Storage Warehouse

The inspectors did not observe any cracks in the floor or liquid in the containment sumps.

The inspectors observed approximately 13 55-gallon containers and 19 supersacks of spent carbon stored in the warehouse (see photograph to the right).



Additionally, the inspectors observed one 55-gallon container of used oil (see photograph below to the left) and one 55-gallon satellite accumulation container for warehouse debris, dated 4/18/11 (see photograph below to the right), in this area.



### Roll-Off Bin Area

The 40-cubic yard roll-off bin containing hazardous waste generated by the facility was closed and dated March 28, 2011 (see photograph to the right). According to the facility representatives, the bin takes approximately two months to fill and is sent off-site for incineration.





### Baghouse Satellite Accumulation Area

An outside hopper is used to introduce the spent carbon into the treatment process. The air from the hopper is pumped through a baghouse and a carbon bed to minimize emissions from the unloading process (see photograph below to the left). The satellite accumulation container attached to the baghouse was dated March 20, 2011 (see photograph below to the right).



### Carbon Absorption Units

Subsequent to the 2009 U.S. EPA inspection, Siemens installed carbon beds to capture emissions from the hazardous waste storage tanks. Two carbon beds, connected in series, were located adjacent to T-1, T-2, T-5 and T-6 (see photograph to the right).



### Secondary Containment Area Around Tanks (T-1, T-2, T-5, & T-6)

No unaddressed cracks were noted in the secondary containment area.

### Area adjacent to the Storage Building (for fines)

The inspectors observed some refractory brick (product) stored on a pallet. Mr. Monte McCue stated that they would be used as needed for the hearth.

When asked by the inspector, Mr. McCue stated that the old refractory brick from the hearths were placed in the 40-cubic yard hazardous waste container.

**Record Review:**

Biennial Report

The inspectors reviewed the 2009 report.

Weekly Inspections

Random weekly inspection records since 2009 were reviewed.

Daily Tank Inspections

Random daily inspection records in 2011 were reviewed.

Tank Certification

Mr. McCue stated that they conducted tank thickness testing in February and that the results would be submitted with the new application.

Manifests and Land Disposal Restriction Notifications

The inspectors reviewed random manifests. The last shipment from the facility was on March 24, 2011.

Training

The training records for Mr. Jesse Garcia, Material Handler, were reviewed.

Contingency Plan

The inspectors reviewed the current contingency plan.

**Attachment:**

1. Photograph log and photographs

# **ATTACHMENT #1**



## ATTACHMENT #1

### Photograph Log for EPA's April 19, 2011 Siemens Water Technologies Corporation RCRA Inspection

*All photographs on this log were taken with a Canon G-12 digital camera by Kaoru Morimoto, RCRA Enforcement Office, EPA Region IX. Please note that each photograph number listed below begins with "IMG\_00" and that the photograph log starts with photograph number 03.*

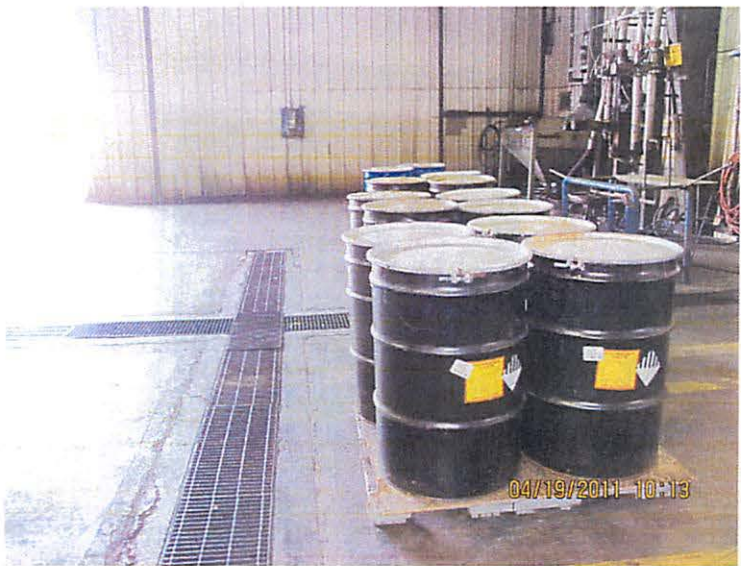
03. Sign located at the front of the facility.
04. Entrance to the facility.
05. Container Storage Warehouse: 55-gallon containers of carbon.
06. Container Storage Warehouse: Supersack containers of carbon.
07. Container Storage Warehouse: Satellite accumulation container of warehouse debris.
08. Container Storage Warehouse: Close-up of the label on the satellite accumulation container of warehouse debris shown in photograph #07.
09. Container Storage Warehouse: 55-gallon container of used oil (with a red funnel).
10. Outside hopper.
11. Overview of the processing area.
12. 40-cubic yard container for hazardous waste generated by the facility.
13. Close-up of the label on the 40-cubic yard container shown in photograph #12.
14. Baghouse and carbon unit for the outside hopper.
15. 55-gallon satellite accumulation container attached to the baghouse in photograph #14.
16. Carbon units used to capture emissions from the hazardous waste storage tanks.
17. Secondary containment area for the hazardous waste storage tanks.
18. Overview of the furnace.



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4/19/2011



IMG\_0004.JPG  
4/19/2011

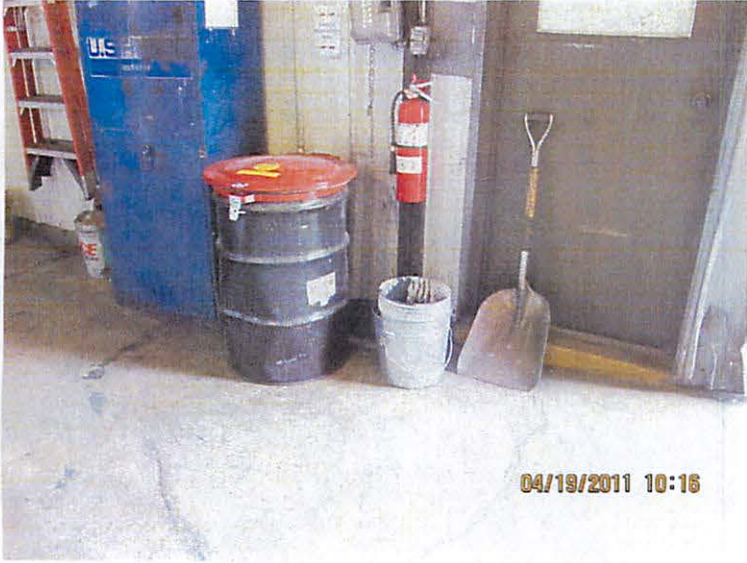


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