

**Region 9 Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	September 18, 2025		Inspection Announced: No
	Entry: approximately 8:01 a.m.		Exit: approximately 12:15 p.m.
Media:	Hazardous Waste		
Regulatory Program(s)	Resource Conservation and Recovery Act (RCRA)		
Facility Name:	Desotec US LLC		
Facility/Site Physical Location:	2523 Mutahar Street		
(city, state, zip code)	Parker, AZ 85334		
Geographic Coordinates:	34.13249, -114.27262		
Mailing address:	2523 Mutahar Street		
(city, state, zip code)	Parker, AZ 85344		
County:	La Paz		
Facility/Site Contact:	Clifford Anderson		Plant Manager
	clifford.anderson@desotec.com		
	928-503-2144 (mobile)		
Facility/Site Identifier:	AZD982441263		
Generator Status:	TSDF, LQG		
Media Number:	FRS# 110058917739		
NAICS:	562112		
Facility/Site Personnel Participating in Inspection:			
Clifford Anderson	Desotec US LLC	Plant Manager	928-503-2144, clifford.anderson@desotec.com
Jarrold Caswell	Desotec US LLC	Production Manager	724-827-8181
Gloria Rodriguez	Desotec US LLC	Office Manager	724-827-8181
Inspector(s):			
John Schofield	Enforcement and Compliance Assurance Division, Hazardous Waste & Chemical Section	Enforcement Assistant/RCRA Inspector	415-972-3472 schofield.john@epa.gov

Inspection Report Author:			
John Schofield	John Schofield Digitally signed by John Schofield Date: 2025.11.24 08:18:41 -08'00'		
	Enforcement and Compliance Assurance Division, Hazardous Waste & Chemical Section	Enforcement Assistant/RCRA Inspector	415-972-3472 schofield.john@epa.gov
Peer Review:			
Tara Frost	TARA FROST Digitally signed by TARA FROST Date: 2025.11.24 08:53:09 -08'00'		
	Enforcement and Compliance Assurance Division, Hazardous Waste & Chemical Section	Environmental Scientist	415-972-3481, frost.tara@epa.gov
Supervisor Review:			
Rick Sakow	RICHARD SAKOW Digitally signed by RICHARD SAKOW Date: 2025.11.24 15:14:41 -08'00'		
	Enforcement and Compliance Assurance Division, Hazardous Waste & Chemical Section	Manager	415-972-3495, sakow.rick@epa.gov

SECTION I – INTRODUCTION

On September 18, 2025, a representative of the U. S. Environmental Protection Agency (EPA) conducted an unannounced compliance evaluation inspection (CEI) of the Desotec US LLC facility located in Parker, AZ (Desotec or facility). The purpose of the inspection was to evaluate Desotec's compliance with applicable federal environmental statutes and regulations, 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 to determine compliance with the Final RCRA Permit (Permit) issued by EPA Region 9 to Desotec (formally Evoqua Water Technologies) in September 2018. A copy of the Permit, Permit application, Permit modification and prior EPA inspection reports can found at the following web-link managed by Desotec: [Circular, mobile filtration solutions for a cleaner,... | Desotec](#).

Five-Year RCRA Compliance History

From 2020 through 2024, EPA Region 9 has performed 2 RCRA CEIs of this facility:

- June 23, 2021, 1 satellite accumulation area (SAA) container labeling potential violation and 1 central accumulation area (CAA) labeling violation.
- September 13, 2023, no areas of concern identified

Opening Conference

At approximately 8:01 a.m., Inspector John Schofield arrived at the Desotec facility. Jennifer Rodriguez, Office Manager, contacted Plant Manager Anderson. During introductions, Inspector Schofield presented his RCRA inspector credentials to Plant Manager Anderson. Inspector Schofield stated to the facility representative that this was a routine, unannounced inspection of the permitted Desotec facility. Further, Inspector Schofield informed the Plant Manager Anderson of the scope of the inspection to include a walk-through of permitted areas and a records review.

During the opening conference, Inspector Schofield informed the Plant Manager that Inspector Schofield may obtain information that Desotec may consider to be Confidential Business Information (CBI), including any photographs that Inspector Schofield may take to document an observation. Desotec would be given the opportunity to make a CBI claim upon receipt of this inspection report.

Before proceeding with the on-site inspection of the facility, Inspector Schofield stated to Plant Manager Anderson that the EPA would appreciate if Desotec after January 1, 2026 would update the facility's EPA identification number to a number that identifies this facility being located on federally recognized Tribal Land (Attachment 1). Mike Zabaneh, EPA Region 9, Land, Chemicals, and Redevelopment Division, RCRA Permits Office, informed Inspector Schofield that updating the EPA identification number would be a Class 1 permit modification. Plant Manager Anderson stated that this would be handled by Desotec US LLC corporate. Inspector Schofield stated he would be providing clarifying information for this request in this inspection report.

Facility/Site Description

The Desotec facility operations is located on the Colorado River Indian Tribes (CRIT) reservation. The facility has approximately 14 employees, operates 24 hours a day seven days a week. The facility regenerates spent carbon for reuse. Carbon regeneration has been performed at this location since 1992.

The RCRA hazardous waste management Permit issued to the facility in September 2018 allows the regeneration of carbon contaminated with hazardous waste subject to the conditions specified in the Permit and in RCRA regulations. During the last year approximately 3.92%

(567,970 pounds) of the spent carbon received at the Parker facility is designated as a hazardous waste under the provisions found in the RCRA regulations.

The regeneration process generally consists of receipt and storage of spent carbon, transfer to one of the spent carbon storage tanks, and top-feeding into a multiple-hearth furnace for multiple-stage heat treatment. Once reactivated, the carbon is stored in product tanks and packaged for resale/redistribution.

Wastes generated by Desotec includes 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.

SECTION II – OBSERVATIONS

After the opening conference, Inspector Schofield and Plant Manager Anderson proceeded to inspect the Desotec operation areas. During the walk-through portion of the inspection, Production Manager Jarrod Caswell joined the inspection.

The following table summarizes the findings and observations Inspector Schofield observed during the on-site inspection:

Observation, Statute or Regulation	Photograph(s)
<u>Observation #1</u> In the permitted hazardous waste storage area, RCRA and non-RCRA hazardous waste containers of spent carbon were observed. The containers observed were either 1 cubic-yard supersacks or 55-gallon metal containers. The metal containers were stacked in three tiers. Each tier of containers was separated by a wooden pallet. Four containers per pallet. Supersack containers were stacked up to 2 tiers on pallets. One supersack container per pallet. The containers and pallets were in good condition. Except for 1 supersack container, all the container labels were visible. While this is not a potential violation of the regulations or Permit, container labels should be visible to ensure that the contents are treated within one-year of receipt. On September 22, 2025, Desotec via email to Inspector Schofield, provided photographic documentation that the container label was now visible.	Photograph 1, 2, 4, 5, 6 and 7.
<u>Observation #2</u> The date on a container of F001, F002, F003, F004, and F039 hazardous wastes was February 21, 2025. The facility has up to one-year to treat the spent carbon.	Photograph 5
<u>Observation #3</u> Desotec Central Accumulation Area. Primarily wastewater treatment filter cake was observed in a closed, labeled, 20 cubic-yard roll-off container. Plant Manager Anderson opened the container to allow inspector Schofield to inspect the contents.	Photograph 9

Observation, Statute or Regulation	Photograph(s)
No issues of concern were identified by Inspection Schofield.	
<u>Observation #4</u> The container label to the 20 cubic-yard container has all the required information for a central accumulation area container. However, the EPA waste code marked on the container is a treatment code (H039), not at EPA waste code (e.g., F039). This observation was not discussed during the inspection or at the closing conference. Note: There is a toxic DOT label next the hazardous waste label. If the container was being prepared for shipment, the hazardous waste code on the label must be change to the appropriate EPA waste code (e.g., F039). This issue was not identified by Inspector Schofield during the inspection or during the Closing Conference.	Photographs 10 and 11

SECTION III – RECORDS REVIEW

The table below lists the records reviewed by Inspector Schofield prior to, during or subsequent to the inspection:

Records Reviewed	Comment (s)
Hazardous Waste Manifests	Manifests for the last year were randomly selected for review. Additionally, prior to and repeated after the inspection, Inspector Schofield obtained manifests from September 14, 2023 to September 17, 2025 from the RCRAInfo e-manifest database. This period represents the date after the most recent EPA CEI to the day before this inspection. Selected manifests of incoming and outgoing manifests from the database were reviewed. No issues of concern were identified.
Land Disposal Restriction (LDR) Notifications	Only the LDR notifications that accompanied the incoming or outgoing manifests that were reviewed during the onsite inspection were evaluated to determine compliance with LDR regulations. No issues of concern were identified.
Personnel Training	Training records for Clifford Anderson were reviewed. No issues of concern were identified.
Contingency Plan	The contingency plan obtained from the Part B permit application

Records Reviewed	Comment (s)
	was reviewed prior to the inspection. Inspector Schofield asked the Plant Manager if the contingency plan had been implemented since the last EPA inspection. The answer was no.
Biennial Report	Documentation that biennial report had been submitted was provided to Inspector Schofield. RCRAInfo confirms that Desotec had made a timely biennial report submission.
Inspection Logs	Inspection logs for the last year were reviewed.
24-Hour Compliance/Process Reports	Random selections of required reports were reviewed to determine if Desotec was operating the thermal treatment unit in accordance with Permit conditions.

Observations, Potential Violations and Areas of Concern records review are documented in the table below.

Observation, Statute and/or Regulation	Facility Response
<u>Observation #5</u> Generally, the inspections logs were in order. There was an issue with a fence repair. Inspector Schofield could not readily ascertain when the identified repair was completed. Inspector Schofield suggested to facility staff that whenever an observed correction to an inspection finding is made, that the date and nature of the repair be made on the following inspection log, after the repair has been completed.	None required
<u>Observation #6</u> Inspector Schofield reviewed randomly selected 24-Hour Compliance/Process Reports for February 2023, February 2024, February 2025, and July 2025. The Permit parameters Inspector Schofield reviewed were focused primarily on carbon feed	To date, Desotec has not provided the EPA with an explanation of the February 25, 2025 24-Hour

Observation, Statute and/or Regulation	Facility Response
(maximum 3,049 pounds/hour), minimum afterburner temperature (1,760 °F), and minimum afterburner temperature (1,350 °F). Except for February 25, 2025, issues where operating temperatures below the Permit conditions and no feed rates or just below operating temperatures and no feed rates were explained by Plant Manager Anderson (e.g., no carbon to feed, refractory brick replacement). For February 25, 2025, the afterburner and hearth temperatures were below 100 °F and feed rates ranged from 305 to 3,943 pounds per hour. Plant Manager Anderson could not find an explanation for this observation in his initial review of the facility's operating record. Inspector Schofield requested that once the reason for this observation could be determined, the information is requested to be provided to the EPA.	Compliance/Process Report observation.

SECTION V – CLOSING CONFERENCE

Inspector Schofield reviewed with the Desotec representatives the initial findings of the inspection. Except for the visible container label issued identified during the inspection, no other issues of concern were provided to the Desotec representatives. Inspector Schofield did state that after reviewing photographs, any submitted documentation, the Permit, and Part B Permit Application that other areas of concern or potential violations may be identified. Also, Inspector Schofield requested that an explanation of Observation #6 be provided to the EPA as soon as practical.

SECTION VI – POST-INSPECTION FOLLOW-UP

SECTION VII – LIST OF ATTACHMENTS

Attachment 1-Region 9 - Federally Recognized Tribes RCRA ID Fact Sheet

Attachment 2-Photograph Log