PERMIT ATTACHMENT

SECTION A

PART A DISCUSSION

This document was not altered from the April 2016 Application.

September 2018

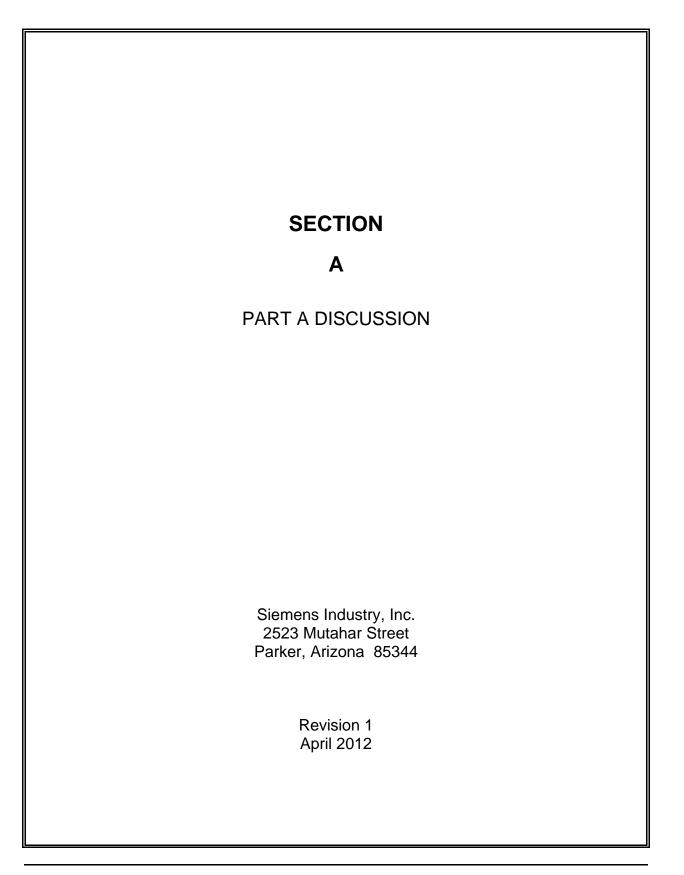


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I PART A PERMIT APPLICATION

A.1 INTRODUCTION

Siemens Industry, Inc. (SII) (formerly known as Westates Carbon – Arizona, Inc. (WCAI) and as Siemens Water Technologies Corp. (SWT)) receives spent (used) activated carbon from its customers. These spent carbons arrive at the Parker facility in a variety of containers, including: barrels, drums, portable tanks, bulk-bags, and bulk truck units. Received spent carbons are thermally reactivated in a furnace. Reactivated carbons are shipped for recycling and/or reuse. This reactivation process is sketched in a Schematic Process Flow Diagram (included in Appendix I). Incidental to the reactivation process is the management of container storage (S01), spent carbon storage tanks (S02), reactivation and reactivation off-gas treatment (X03), and the non-hazardous slurry transfer (recycle water) system, wastewater treatment system, rainwater collection system, and reactivated carbon product storage and shipping.

The November 1995 RCRA Part B permit application discussed an existing carbon reactivation furnace (RF-1) and a future second carbon reactivation furnace (RF-2) that was expected to be installed at the facility. Currently, the second carbon reactivation furnace is operational and the old carbon reactivation furnace was shut down in June 1996, and will not be returned to service. With the exception of a RCRA Closure Plan prepared specifically for the old RF-1 unit, the Part B Permit Applications will only discuss the second carbon reactivation furnace that will continue to be abbreviated in the permit applications as RF-2.

EPA has requested the submittal of a Part A application showing both the inactive RF-1 unit as well as the active RF-2 unit. Therefore, the Part A application from October 1996 has been included in Appendix I.

Since the time of the original October 1996 Part A submittal, the facility has removed certain waste codes from the list of those accepted, and has also been requested by EPA to add a new hazardous waste tank (which increases the tank capacity). Additionally, a Performance Demonstration Test (PDT) of the RF-2 unit has been conducted, resulting in a higher processing capacity than shown on the 1996 Part A application. These differences are reflected in the Part B application. For these reasons, a revised set of Part A forms has been included in Appendix I, in addition to the original 1996 Part A application. This revised set of Part A forms are provided for informational purposes only, and are consistent with the information presented in the Part B application. This supplemental information should provide the EPA reviewers with appropriate information to resolve any apparent discrepancies between the 1996 Part A and the current Part B materials.

Photographs of the facility clearly delineating all treatment, storage, and disposal areas are included with the Part A. A scale drawing of the facility is also included showing the location of all treatment, storage, and disposal areas.

Appendix I also includes a topographic map, property layout drawing, equipment location drawing, and schematic process flow diagram. These figures depict the facility and each of its intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, as well as surrounding land use and water bodies.

There are no injection wells associated with this facility, nor are there any springs, drinking water wells, or surface water bodies within one-quarter mile of the facility.