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

April 20, 2015 Certified Mail No: 7001 2510 0003 5943 3775

Monte McCue
Director of Plant Operations
Evoqua Water Technologies, LLC
2523 Mutahar Street
PO Box 3308
Parker, AZ 85344

Dear Mr. McCue:

On March 3-4, 2015, representatives of the U.S. Environmental Protection Agency (EPA) an unannounced compliance evaluation inspection (CEI) of Evoqua Water Technologies, LLC (Evoqua) with EPA ID No: AZD982441263. The purpose of the inspection was to determine Evoqua'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 262, 268 and Part 265 Interim Status standards for treatment and storage facilities. The EPA inspectors were accompanied during the CEI by Evoqua personnel Monte McCue, Director of Plant Operations and Roy Provins, EH&S Manager.

The inspectors conducted a physical inspection of the facility and reviewed records related to Evoqua's hazardous waste management practices. The facility operations and records reviewed during the CEI are summarized below.

Components inspected during the CEI:

1. Condition of secondary containment structures surrounding hazardous waste tanks, and
2. Hazardous waste container storage areas and emergency equipment,

Records Reviewed during the CEI:

1. Compliance with Part 265 Interim Status Standards,
2. Operating parameter limits for the RF2 Thermal Desorption Treatment Unit,
3. Operating parameter limits for the associated air pollution control equipment;
4. Training records,
5. Most recent tank inspection, dated April 23, 2012,
6. Financial Assurance documentation submitted to EPA on 3/3/2015,
7. Contingency Plan dated August 2014,
8. Hazardous Waste Manifests from 2012-2015,
9. Inspection logs,

10. Closure / Post-Closure Plan, and
11. 2011 and 2013 Biennial Reports.

Inspectors did not observe any significant violations during the CEI.

Confidential Business Information

EPA regulations governing confidentiality of business information are set forth in 40 CFR Part 2, Subpart B. EPA routinely provides copies of investigation reports to state 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 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 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. EPA will construe the failure to furnish a confidentiality claim within fourteen (14) calendar days from the date of EPA's receipt of Evoqua's response to this letter as a waiver of that claim and information may be made available to the public by the EPA without further notice. See, 40 CFR § 2.203(a)(2).

EPA anticipates no further action with regard to these violations at this time. This letter should not be construed as a determination by the EPA of compliance with any other applicable regulation. Thanks you for your cooperation. If you have any questions please contact Rick Sakow of my staff at (415) 972-3495.

Sincerely,

Douglas K. McDaniel
Chief, Waste and Chemical Section
Enforcement Division

Prepared by:
4/17/2015
Rick Sakow
Inspector, Waste and Chemical Section

Cc: Wilfred Nabahe, EPO Director, Colorado River Indian Reservation