



September 19, 2016

VIA EMAIL

Mr. Gerardo C. Rios
Chief, Permits Office
Air Division – EPA Region 9
75 Hawthorne Street – Mail Code AIR-3
San Francisco, CA 94105

**Re: Evoqua Water Technologies – Parker, Arizona
Annual SO₂ and NO_x Annual Emission Limits**

Dear Mr. Rios:

Thank you for your letter of August 3 and our subsequent discussions by phone. We appreciate that EPA has asked for additional clarity on practical enforceability, and while we do not necessarily agree that this is necessary, we are hopeful that we can accommodate your request.

Evoqua would agree to the placement in the forthcoming RCRA permit of annual stack emission limits on Sulfur Dioxide (SO₂) and Nitrogen Dioxide (NO_x) emissions from our carbon reactivation furnace, as follows:

For SO₂, a 30 tons per year limit, demonstrated on a calendar year basis, using sulfur content of the feed, carbon reactivation production rate, and hours of operation over the course of the year, minus a 90% presumed sulfur removal rate from our scrubber system (which we believe to be a very conservative estimate of its removal efficiency).

For NO_x, a 22 tons per year limit, demonstrated on a calendar year basis, using the NO_x stack gas concentration from the most recent stack test where NO_x was measured (average of 3 runs), flow rate out the stack and the hours of operation of the of the reactivation unit.

We hope this adequately responds to your request. Please call with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Monte McCue".

Monte McCue
Evoqua Plant Manager