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*A Wheelabrator Technologies Company*

January 14, 1994

Mr. Michael Feeley, Chief  
Permits and Solid Waste Branch  
United States Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Re: Westates Carbon-Arizona, Inc.  
Parker Reactivation Facility  
EPA ID No. AZD 982 441 263

Dear Mr. Feeley:

In your letter dated August 30, 1993, you required that a Part B application for the Parker Reactivation Facility be submitted within six months. By this letter, we are requesting an extension of the time period allowed for the submittal of the Part B application for the subject facility. The additional time is necessary because we are conducting a test burn and emissions testing program to generate actual emissions data associated with the facility. This information is being generated to satisfy your request for predicted emissions data. We intend to use the emissions data in a screening health risk assessment which we also intend to submit with the Part B application.

Westates has contracted with an independent air quality testing firm to conduct emissions testing at the Parker Facility. The first phase of the testing program was completed between November 18, 1993 and November 22, 1993. During this phase, a test burn was conducted to determine the destruction and removal efficiency associated with the facility. Additional emissions testing was also conducted while the facility was reactivating a range of representative carbons. Data was collected on the criteria pollutants, hydrogen chloride, chlorine, metals, dioxins/furans and PAH's. A draft report summarizing the results of that program is scheduled to be received from the testing firm by the end of January, 1994.

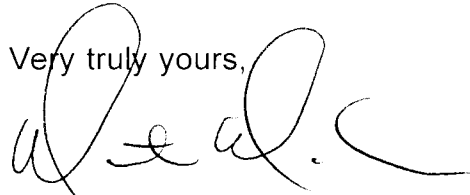
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A number of improvements are currently being completed at the facility to improve the particulate removal efficiency. A second phase of emissions testing is scheduled for the week of January 23, 1994 to collect additional particulate and metals emissions data. The draft report presenting the results of this testing program is scheduled to be submitted to Westates by March 18, 1994.

As discussed above, it is our intention to use the data from these testing programs to conduct a screening level health risk assessment. Westates has hired a health risk firm to conduct that assessment and it is our intention to submit the results of that study with our Part B application.

To facilitate these additional work efforts, we request an extension of the Part B application deadline until June 30, 1994. We believe that adding this additional information to the application will specifically address the issues raised in your August 30, 1993 letter and significantly improve the quality of the application. If you have any questions regarding this request, please call me at 602-669-5758, or Matt Killeen at 1-800-682-0026.

Very truly yours,



Monte McCue  
Plant Manager

cc: Ray Fox - Region IX  
Matt Killeen  
Certified Mail

