



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

Certified Mail
No. P 887 520 930
Return Receipt Requested

AUG 30 1993

In Reply
Refer to: H-3-3
AZD 982 441 263

Mr. Monte McCue
Plant Manager
Westates Carbon-Arizona Inc.
2523 Mutahar Street
Parker AZ 85344

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

Dear Mr. McCue:

In accordance with Title 40 of the Code of Federal Regulations (40 CFR), Part 270.1(b) you are requested to submit a Part B application for a permit under 40 CFR Part 264 Subpart X, Subpart AA and Subpart BB, for the subject facility as described in your Part A Permit Application dated November 30, 1992. This facility is currently subject to the interim status standards of 40 CFR Part 265 Subpart P, Subpart AA and Subpart BB. The Part B permit application should be submitted no later than six months after the date of this letter.

The content of the application should conform to the requirements of 40 CFR Parts 264 and 270, especially 40 CFR 270.14 and 270.23.

You will note that Section 270.23(c) requires information on the potential exposure of humans or environmental receptors to hazardous waste or hazardous constituents and on the potential magnitude and nature of such exposure. Potential sources of exposure which will be of particular importance will be stack and fugitive emissions from the carbon regeneration units.

Carbon regeneration units are not regulated under 40 CFR Subpart H - Hazardous Waste Burned in Boilers and Industrial Furnaces. However, in order for us to make a preliminary

evaluation of the risk posed by your emissions, we request that stack and fugitive emission information provided should include predicted uncontrolled and controlled emissions to the atmosphere of organics, carbon monoxide, particulate matter, metals, hydrogen chloride and chlorine, as referenced in 40 CFR Subpart H, Sections 266.104, 266.105, 266.106 and 266.107.

Dependant on the results of our preliminary evaluation of risk from stack and fugitive emissions (based on the information you supply), we may request that you submit a site specific risk assessment in accordance with 40 CFR 270.32(b)(2). Alternatively, you may elect to submit a site specific risk assessment initially, without awaiting our preliminary risk evaluation.

Enclosed for your reference is our "Preapplication Package for Boilers and Industrial Furnaces which Burn Hazardous Waste" which outlines the procedures and requirements for processing an application for a permit under 40 CFR Part 266 Subpart H. Although certain sections do not apply directly to your specific case, we believe the package will be helpful to you in preparing your application. In particular, Item 9 provides general guidance on the preparation of a health risk assessment, should one become necessary or should you decide to submit one initially.

If you have any questions regarding the scope or content of the Part B application, or any other questions, please do not hesitate to contact Ray Fox, of my staff, at (415) 744-2053.

Sincerely,



Michael Feeley, Chief
Permits and Solid Waste Branch

Enclosures:

cc: Conner Byestewa, Environmental Director
Colorado River Indian Tribes
Route 1, Box 23B
Parker AZ 85344

Amy Heuslein, Environmental Quality Services
Bureau of Indian Affairs, Phoenix Area Office
P.O. Box 10
Phoenix AZ 85001

Allen Anspach, Superintendent
Bureau of Indian Affairs, Colorado River Agency
Route 1, Box 9-C
Parker AZ 85344

Matt Killeen
Wheelabrator Environmental Systems Inc.
Liberty Lane
Hampton NH 03842