

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
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**(1ST) P 010 177 418, (2ND) P 010 177 419, (3RD) P 010 177 420, (4TH) P010 177 421**

January 16, 1995

Mr. Michael Feeley, Chief  
Permits And Solid Waste Branch  
U.S. 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 H-3-3**

Dear Mr. Feeley:

In accordance with your August 30, 1993 request, as modified by your January 24, 1994 and June 14, 1994 letters, enclosed please find four (4) copies of the revised Part A applications and the original Part B application for the subject facility. The application contains all of the information required by the applicable sections of 40 CFR Parts 264 and 270.

This application includes the results of performance demonstration testing that was conducted during November 1993 and January 1994. The testing was conducted to demonstrate the performance of the facility (including destruction and removal efficiency) and to collect comprehensive emissions data. This testing was performed by an independent testing company using sampling and analytical methodologies that are consistent with EPA guidance for performing trial burns.

This application also includes a human health risk assessment in accordance with the suggestions in your August 30, 1993 letter. The risk assessment was based on the actual stack test data collected during the performance demonstration testing program. The assessment was conducted by health risk professionals in a manner that is consistent with published EPA risk assessment guidance and the recommendations of the U.S. National Academy of Sciences.

As discussed with Mr. Ray Fox of your staff, the application includes a description of the existing reactivation unit and a description of the anticipated phased development of the second

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WCAI Part B Submittal

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reactivation unit. The phased construction of Unit 2 (RF-2) is structured in a manner that is consistent with the approach discussed in Mr. Zelikson's letter of December 29, 1993 and in your letter of June 3, 1994.

The application also includes a request to increase the reactivation capacity from 2760 lb/hr of spent carbon feed to 4140 lb/hr of spent carbon feed and a request to increase the container storage capacity from 100,000 gallons to 200,000 gallons. We are also submitting four copies of a supplemental Part A application which addresses the proposed expansion. This Part A is not yet effective, but is submitted to ensure that you have a complete submittal for purposes of reviewing the request for increased capacity.

If you have questions or comments related to the applications, please call Matt Killeen at 1-800-682-0026.

Sincerely,



Monte McCue  
Plant Manager

Enclosures

cc: Daniel Eddy, Jr., Chairman (w/o enclosures)  
Conner Byestewa, Environmental Director  
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Ray Fox (w/o enclosures)  
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