

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

3A-6

AZD 982 441 263

MAY 14 2008

CERTIFIED MAIL NO. 7005 3110 0002 8246 9893
RETURN RECEIPT REQUESTED

Monte McCue
Director of Plant Operations
Siemens Water Technologies Corp.
2523 Mutahar Street
PO Box 3308
Parker, AZ 85344
EPA Identification Number: AZD982441263

Dear Mr. McCue:

On September 13, 2007, a hazardous waste compliance inspection was conducted by representatives of the United States Environmental Protection Agency ("EPA"), accompanied by personnel from the Colorado River Indian Tribe Environmental Health Office, at Seimens Water Technologies located in Parker, AZ, with EPA Identification Number AZD982441263. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. § 6927(a)}.

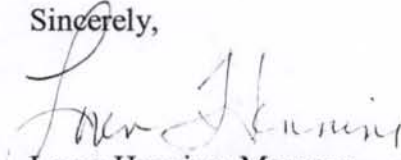
The September 13, 2007 compliance evaluation inspection found no violations of RCRA at Seimens facility. A copy of the inspection report is enclosed for your information ("Enclosure"). This letter should not be construed as a determination by the EPA of your compliance with any other applicable regulation.

The EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed

only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within fourteen (14) calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

If you have questions related to the inspection report or this letter, please contact Estrella Armijo of my staff at (415) 972-3859

Sincerely,



Loren Henning, Manager
RCRA Enforcement Office

Enclosure

cc (w/o enclosure): Hector Duran, Colorado River Indian Tribe Environmental Health Office



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

WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT OFFICE

Purpose: RCRA Compliance Evaluation Inspection

Facility Location: Siemens Water Technologies Corp.
2523 Mutahar Street
PO Box 3308
Parker, AZ 85344

U.S. EPA ID Number: AZD982441263

Date of Investigation: September 13, 2007

U. S. EPA Investigators: Estrella Armijo
RCRA Enforcement Officer
(415) 972-3859
armijo.estrella@epa.gov

Jim Polek
RCRA Enforcement Officer
polek.jim@epa.gov

**Colorado River Indian Tribes
Environmental Protection Office:** Hector Duran
Pesticide Officer
(928) 662-4336
hector.duran@critepo.com

Facility Representatives: Monte McCue
Director of Plant Operations
(928) 669-5758 x 17
monte.mccue@siemens.com

Douglas Eisner
Regional Manager, EHS
(510) 639-7274 x 102
douglas.eisner@siemens.com

Report Prepared By: Estrella Armijo

Report Date: February 8, 2008

Background

Siemens Water Technologies Corp. (herein "Siemens" or the "facility") is located at 2523 Mutahar Street in Parker, Arizona, 85344. The facility has applied for a Resource Conservation and Recovery Act (RCRA) permit and is operating under "interim status" under Section 3005(e) RCRA, 42 U.S.C. §6925(e) as a permitted hazardous waste storage and treatment facility. Detailed information on the facility's operations and regulated history can be found in the current permit renewal application and previous inspection reports, most recently the 2/12/2004 compliance evaluation inspection (CEI) for which this inspection was a follow up.

Investigation

On September 13, 2007, EPA inspectors accompanied by personnel from the Colorado River Indian Tribe Environmental Health Office, conducted a RCRA CEI at Siemens. The purpose of the inspection was to determine the compliance of the facility with hazardous waste regulations in 40 Code of Federal Regulations (CFR) Subtitle C, Parts 261-265, 263, 268, 273 and 279. The most recent inspection of Siemens, conducted on February 12, 2004, addressed the regulatory requirements typically covered during a CEI. The focus of this inspection was to follow up with previously found violations and compliance tasks. During previous CEIs, EPA inspectors observed that many of the cracks in the secondary containment had not been noted in the inspection logs and had not been remedied. Compliance tasks required the facility to install secondary containment for Tanks T-1, 2, 5 and 6 in order to meet the capacity requirements outlined in 40 CFR §265.193 and to replace tank T-18 with a double-walled tank that complies with the requirements of 40 CFR §§265.192 and 265.193.

Site Inspection

The inspectors walked through the facility beginning at the loading/unloading pad. The pad did not appear to have cracks. Facility personnel stated that the pad had been paved in the last 3-4 years. The inspector's then walked through the warehouse, where hazardous waste is stored, no violations were noted. The inspector's walked up T-18 and opened the check valve to ensure the tank was double walled and not leaking. Tank certifications were reviewed during the records review. Secondary containment for T-1, 2, 5 and 6 was noted and containment capacity calculations were reviewed during the records review. The facility had repaired several cracks outside of the containment area. A review of their policy for repairing cracks and daily log showed that these cracks had been noted and repaired, accordingly.

Record Review

- Permit Application
- Waste Analysis Plans and Records
- Manifest/LDR's

- Biennial Reports
- Weekly/Daily Inspection Logs
- Personnel Training Plan and Records
- Arrangements with local emergency authorities
- Contingency Plans and Emergency Procedures
- Tank Test data (tank certifications)
- Containment Area Volumes

Areas of Concern:

Based on the record review, the personnel training plan lacked the names of employees holding each of the described positions. This information was in electronic form and later shown to the inspectors. The contingency plan had outdated emergency coordinator information. An update to the plan was requested and a copy of the corrected information was received.