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PERMIT ATTACHMENT

SECTION I

CLOSURE PLAN,  
CLOSURE COST ESTIMATE  
AND FINANCIAL ASSURANCE

This section was not altered from the April 2016 Application.

September 2018

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**SECTION  
I**

**CLOSURE PLAN,  
CLOSURE COST ESTIMATE  
AND FINANCIAL ASSURANCE**

**Evoqua Water Technologies  
2523 Mutahar Street  
Parker, Arizona 85344**

**Revision 2  
June 2014**

**TABLE OF CONTENTS**

<b><u>Section</u></b>	<b><u>Page</u></b>
I.1 INTRODUCTION .....	I-1

**LIST OF CITED APPENDICES**

**Appendix**

XV	RCRA FACILITY CLOSURE PLAN
XVI	RF-1 CLOSURE PLAN
XVII	CLOSURE ACTIVITY SAMPLING AND ANALYSIS PLAN AND CLOSURE ACTIVITIES QUALITY ASSURANCE PROJECT PLAN
XVIII	FINANCIAL ASSURANCE INSTRUMENT

## **I.1 INTRODUCTION**

The Evoqua Water Technologies (EWT) facility accepts spent activated carbon in containers (drums and bulk) from various customers. The spent activated carbon is identified as both hazardous and non-hazardous waste and is managed at the facility in the container storage area, five storage tanks (T1, T2, T5, T6, and T18), and ultimately in the carbon reactivation unit (RF-2). Previously, the spent activated carbon was reactivated using carbon reactivation unit (RF-1), which is now inactive.

The facility, including RF-1, began construction in 1991 and operations commenced in August 1992. The RF-1 unit treated spent activated carbon exclusively during the time of operation. The RF-1 unit was shut down, after wastes were removed, in June of 1996 to allow for the final construction phase and startup of RF-2 in July 1996 to full interim status capacity.

Currently RF-1 does not share any equipment with RF-2. With a few exceptions, all RF-1 equipment (which includes the reactivation furnace, APC equipment/piping, and fan) remains on site. RF-1 is not currently and will not in the future be operational.

EWT has prepared two separate closure plans; one for RF-1 and one for the overall facility (including RF-2).

The RF-1 Closure Plan can be found in Appendix XVI, and covers only the partial closure activities associated with the inactive RF-1 unit. The RCRA Facility Closure Plan can be found in Appendix XV, and covers activities related to the eventual closure of all other hazardous waste portions of the facility, including RF-2 and all hazardous waste management units (HWMUs) described in the facility's Part A application.

The contents of the Closure Plans are based upon, and meet all the criteria set forth in 40 CFR Part 264, Subparts G and H. A sampling and Analysis Plan and a Quality Assurance Project Plan, applicable to both closure plans have been developed and are included in Appendix XVII.

Activities associated with closure of the HWMUs will include treatment and/or removal of all hazardous waste inventory, decontamination of storage and treatment equipment and paved surfaces, sampling and analysis to ensure that decontamination is adequate, sampling and analysis to determine if soil contamination has occurred and certification of closure by the facility owner and/or operator and a registered professional engineer. The Closure Plans also includes a cost estimate and financial assurance mechanism for the closure activities. The financial assurance instrument can be found in Appendix XVIII.

There are no underground storage tanks or other treatment and disposal units at the facility that require the submittal of a contingent post-closure plan per 40 CFR 264.118.