From: Belcourt, Jamie

To: "Bryan Hudson"; Bart Sherman; Kristopher Sherman; Mitch Johnson; randyc@sbht.com

Cc: Wassell, Stacie; Healey, Richard

Subject: RE: Semiannual Pretreatment Reports

Date: Friday, July 1, 2022 12:25:11 PM

Attachments: <u>image004.png</u>

image003.png

Importance: High

### Hello.

Thank you for your semiannual pretreatment report submission for April 2022 and resubmission of the semiannual pretreatment report for October 2021. These reports were received, reviewed, and deemed complete with the reporting requirements in 40 CFR 403.12(e).

However, the OWQ did notice issues with sampling procedures and preservation methods on the chain of custody documentation that was submitted. Please refer to the list below of items of note on the chain of custody documentation in each report.

## April 2022 Semiannual Report:

¡¤ Samples were taken on March 8, 2022, and were received in the laboratory for analysis on March 11, 2022. This is a period of three (3) days after sample collection.

 $\mu$  Samples were noted to be preserved on ice, but arrived at the laboratory at a temperature of 14.4 $\mu$ C (57.9 $\mu$ F).

¡¤ Samples did not have custody seals.

# October 2021 Semiannual Report:

¡¤ Samples were taken on September 21, 2021, and were received in the laboratory for analysis on September 27, 2021. This is a period of six (6) days after sample collection.

¡¤ Samples were noted to not have been preserved on ice, nor with any other preservation method.

¡¤ Samples were noted to have arrived at the laboratory at a temperature of 20.7;ÆC (69.2;ÆF).

¡¤ Samples did not have custody seals.

In the future, please ensure that samples are both cooled and analyzed as soon as possible. Samples may be shipped overnight, or an alternative shipping/carrier method may be chosen to minimize holding times. In addition, please be sure to follow proper sampling procedures and ensure that custody seals are intact and temperature of samples are maintained  $\leq 6$  [ÆC. Future instances of noncompliance with the procedures set forth in 40 CFR Part 136 may result in enforcement action. Please reply to this email to let me know that you have received it.

If you have any questions or concerns, or if I can be of any assistance, please do not hesitate to reach out.

Thank you,

Jamie Belcourt | Pretreatment Coordinator

# **Division of Environmental Quality | Office of Water Quality**

5301 Northshore Drive | North Little Rock, AR 72118 t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us

**From:** Bryan Hudson [mailto:BryanH@sbht.com]

Sent: Monday, June 20, 2022 10:25 AM

To: Belcourt, Jamie; Bart Sherman; Kristopher Sherman; Mitch Johnson

Subject: RE: Semiannual Pretreatment Reports

Jamie, I think this is everything that needs to be resubmitted.

**From:** Belcourt, Jamie [mailto:jamie.belcourt@adeq.state.ar.us]

**Sent:** Monday, June 20, 2022 8:31 AM

**To:** Bryan Hudson ; Bart Sherman ; Kristopher Sherman ; Mitch Johnson

**Subject:** Semiannual Pretreatment Reports

Hello,

PJ's Tank Wash pretreatment semiannual report for the October 1, 2021 through March 31, 2022 reporting period has not yet been received. If you have submitted a copy to this office, please resubmit another copy.

In addition, DEQ's OWQ has no record of a semiannual report received for the April 1, 2021 through September 30, 2021 reporting period. Please resubmit a copy of this report as well.

If you have any questions, please do not hesitate to reach out.

Thank you,

Jamie Belcourt | Pretreatment Coordinator

**Division of Environmental Quality | Office of Water Quality** 

5301 Northshore Drive | North Little Rock, AR 72118 t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us

# SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR442

Use of this form is not an EPA/ADEQ requirement. Attn: Water Div/NPDES Pretreatment (1) IDENTIFYING INFORMATION LEGAL NAME & MAILING ADDRESS **FACILITY & LOCATION ADDRESS** PJ's Tank Wash, DBA PJ's Tank Wash Sherman Bros, Trucking 2201 Hwy 82 West Po box 706 Harrisburg OR, 97466 Crossett AR, 71635 C. FACILITY CONTACT: Bryan Hudson TELEPHONE NUMBER: 870-364-7020 Email:BryanH@sbht.com (2) REPORTING PERIOD--FISCAL YEAR From April 1st to March 31st (Both Semi-Annual Reports must cover Fiscal Year) A. MONTHS WHICH REPORTS ARE DUE B. PERIOD COVERED BY THIS REPORT October & April FROM: April 1 2021 TO: September 30 2021 (3) DESCRIPTION OF OPERATION A. REGULATED PROCESSES SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE. Subparts CHECK EACH APPLICABLE BLOCK ✓ Tank Trucks/Chemical & Petroleum Cargo PJ's Tank Wash has discharged into the City of Crossett POTW between April 1 2021 and September 30 2021 a continuous flow from effluent holding. Test results are given to City engineer as ☐ Rail Tank Cars/Chemical & Petroleum Cargo well as the City pulls separate periodic tests to insure limits are met. ☐ Barges & Ocean/Sea Tankers/Chem & Petro Cargo ☐ Tanks/Food Grade Cargos Comments: Tanker Trailers/Chemical Number of Regular Employees at this Facility D. [Reserved]

# (4) FLOW MEASUREMENT

### INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge
Regulated	2750	, 17-109-140-1	Continuous
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW	2750		Continuous

<sup>\*&</sup>quot;Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(3) MEASUREMENT OF POLLUTANTS	
A. TYPE OF TREATMENT SYSTEM	B. COMMENTS ON TREATMENT SYSTEM
CHECK EACH APPLICABLE BLOCK	
☐ Neutralization	
✓ Chemical Precipitation and Sedimentation	
□DAF	
☐ Filtration	
☐ Other	
□ None	

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

Pollutant(mg/l)	Cu	Hg	O&G (SGT-HEM Method)
Max for 1 day	0.84	0.0031	<5.0
Max Measured	0.196	N/D	<5.0

40CFR442 SEMI-ANNUAL REPORT CON'D FACILITY NAME:
Sample Location _PJ's Tank Wash Crossett Ar. 71635
Sample Type (Grab or Composite)Grab
Number of Samples and Frequency Collected 2 times, Every 3 months
40CFR136 Preservation and Analytical Methods Use: x Yes ☐ No
(6) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]
'6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.—The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe
manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.
The User may list any new or ongoing Pollution Prevention practices including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:
All water used in the tank wash operation is contained and recycled or returned to the city sewer system. We have a residual Product Management Plan, which includes RCRA/DOT
class room testing and certification in accordance with 40 CFR part 264.16 and 49 CFR par
172.704. this training includes carefully segregating heels for determining proper disposal.
(7) GENERAL COMMENTS
(8) SIGNATORY REQUIREMENTS [40CFR403.12(1)]

# 40CFR442 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

I certify under penalty of law that I have personally examined and am familiar with the were prepared under my direction or supervision in accordance with a system designer and evaluate the information submitted. Based on my inquiry of the person or person responsible for gathering the information, the information submitted is, to the best of complete. I am aware that there are significant penalties for submitting false information.	ed to assure that qualified personnel properly gather is who manage the system, or those persons directly my knowledge and belief, true, accurate, and
imprisonment for knowing violations.	Λ.
Bryan Hudson	
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE	SIGNATURE
The second of th	·
Tank Wash Manager OFFICIAL TITLE	10-06- Z0Z1 DATE SIGNED

222 Spring St. Shreveport, La. 71101 · 800-256-6110 · 318-220-9067 · Fax 318-221-3296 LELAP CERTIFICATION # 02082

Client: P J'S TANK WASH

2201 HWY 82 W

CROSSETT, AR 71635

Report Date:

10/06/21

Sample ID:

WATER SAMPLE

Page 1 of 1

Collected By:

**CLIENT** 

Time/Date Collected:

1040 09/21/21

Date Received:

09/27/21

### ANALYTICAL RESULTS

GSEL ID#: 118941

### **GENERAL CHEMISTRY**

Sample Matrix:	LIQUID							
Analyte	Results	Units	Qualifier	Reporting Limit	Dil. Factor	Method	Time/Date Analyzed	Analyst
OIL & GREASE	<5.0	mg/L		5.0	1	EPA 1664A (HEM)	1340 - 09/30/21	CSK

### **METALS**

Sample Matrix:	LIQUID					#		
Analyte Unit	s: mg/L	Result	Qualifier	Reporting Limit	Dil. Factor	Method	Time/Date Analyzed	Analyst
COPPER		0.196		0.001	1	EPA 200.8	1710 - 10/04/21	LWZ
MERCURY		ND		0.00020	1	EPA 245.2	1557 - 10/04/21	BDP
Prep Method:	EPA 200.8		Prep Date:	09/30/21		A I	T 11/7	
_			Trep Date:	09/30/21		Analyst:	LWZ	
Mercury Prep Method:	EPA 245.2		Prep Date:	10/01/21		Analyst:	BDP	

<sup>\*</sup>Sample subcontracted to NELAP certified lab #01955.

TNTC - Too numerous to count

E - Surrogate recovery unreportable due to dilution

U - Analyte not on current Scope of Accreditation

A - Analyte detected in the associated method blank

B - Estimated value between the detection limit and the reporting limit

C - Estimated value exceeds the calibration curve

D - Surrogate recovery outside advisable QC limits

F - Matrix interference

G - Method specific criteria not met

H - Some of the QC was outside the normal range

# CHAIN-OF-CUSTODY / ANALYTICAL DATA REQUEST

(318)220-9067 or (800)256-6110 Bryan Hudson 870-304-918 Remarks www.gulfstateslab.com (318)221-3296(FAX) (Print) Stylou Hudson Date/Time: 2:00 pm 9-21-21 Attention: Phone #: Location: P.O.#: E-mail: Cell Date/Time: Date/Time: Date/Time: Date/Time: Temp.: POS<sup>z</sup>I əgbuld biupd lios bilos start TIME end Project Name: Address: 2261 12nd 82 west Composite Sample Res. Cl: PS'S Task wash Gulf States Environmental Laboratories (Print)\_ (Print)\_ (Print) start DATE end Sampler: Client GPD 222 Spring St. Shreveport, LA 71101 Grab Sample Date Flow: Company: eceived In Laboratory: (Signature): elinquished By: (Signature): 126811 elinquished By: (Signature): eceived By: (Signature): eceived By: (Signature): SU .S.E.L. #: 03

222 Spring Street; Shreveport, LA 71101 Phone: (318) 220-9067 Fax: (318) 221-3296 LELAP Certification No.: 02083

# SAMPLE RECEIPT FORM

	•	
Client: PJS Tank Wash.	GSEL#	
Received By/Date and Time: 0 92721	Nioo	
Sample Brought in By: Client GSEL	Other UPS	
Temperature:	In 2	
Logged in By:		
<ol> <li>Shipping container/cooler arrive in good condition?</li> <li>Was sufficient ice used? (*See Note below)</li> <li>Were custody seals intact on sample bottles?</li> <li>Were custody papers (Chain of Custody) with samples?</li> <li>Were custody papers properly filled out?</li> <li>Were custody papers signed by the client and the lab?</li> <li>Were samples collected in containers provided by GSEL?</li> <li>Did all sample containers arrive in good condition?</li> <li>Were all container labels complete?</li> <li>Did all container labels agree with custody papers?</li> <li>Was sufficient sample sent for requested analysis?</li> <li>Were all samples received within holding times?</li> <li>Do VOA vials have zero headspace?</li> <li>Was preservation checked upon receipt?</li> <li>*VOA preservation checked after sample analysis.</li> <li>*Oil and Grease and TOC checked during sample analysis.</li> <li>Was the correct preservative used?</li> </ol>	Yes No Not Present Yes No Not Required Yes No Not Present Yes No Not Present Yes No Not Present Yes No	
Issues/Discrepancies: Number 2 sample was not on the		
Person contacted about Issues/Discrepancies:		
Instructions:		

\*Note: In accordance with 40CFR Title 33:1 and TNI Standards samples that are delivered to the laboratory on the same day as collection may not meet the requirements of the temperature being at or below 6°C. In these cases, the samples shall be considered acceptable if the samples were received on ice and the cooling process has begun.

222 Spring St. Shreveport, La. 71101 · 800-256-6110 · 318-220-9067 · Fax 318-221-3296 **LELAP CERTIFICATION # 02082** 

Client: P J'S TANK WASH

2201 HWY 82 W

CROSSETT, AR 71635

Report Date:

03/29/22

Sample ID:

**EFFLUENT** 

Collected By:

**CLIENT** 

Time/Date Collected:

1000 03/08/22

Page 1 of 1

Date Received:

03/11/22

# ANALYTICAL RESULTS

GSEL ID#: <u>120702</u>

## **METALS\***

Sample Matrix:	LIQUID								
Analyte Units:	mg/L	Result	Qualifier	Reporting Limit	Dil. Factor	Method	Time/I	Date Analyzed	Analyst
MERCURY	***	0.037		0.003	1	EPA 200.7	1658	- 03/22/22	STS
MERCORT		<0.000200		0.000200	1	EPA 245.1	1041	- 03/23/22	BXB

<sup>\*</sup>Sample subcontracted to NELAP certified lab #01997.

# GENERAL CHEMISTRY

Sample Matrix:	LIQUID				· · · · · · · · · · · · · · · · · · ·		·		
Analyte OIL & GREASE	Results	Units	Qualifier	Reporting Limit	Dil. Factor	Method	Time/	Date Analyzed	Analyst
OIL & GREASE	<5.0	mg/L		5.0	1	EPA 1664A (HEM)	0933	- 03/17/22	CSK

TNTC - Too numerous to count

E - Surrogate recovery unreportable due to dilution

F - Matrix interference

U - Analyte not on current Scope of Accreditation

A - Analyte detected in the associated method blank

B - Estimated value between the detection limit and the reporting limit

C - Estimated value exceeds the calibration curve

D - Surrogate recovery outside advisable QC limits

G - Method specific criteria not met

H - Some of the QC was outside the normal range

# CHAIN-OF-CUSTODY / ANALYTICAL DATA REQUEST

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Page: A of A

222 Spring Street; Shreveport, LA 71101 Phone: (318) 220-9067 Fax: (318) 221-3296 LELAP Certification No.: 02083

# SAMPLE RECEIPT FORM

Client: PT5 lank Wash  Received By/Date and Time: CO 3-11-22  Sample Brought in By: Client GSEL  Temperature: 14.4°C Thermometer ID:  Logged in By: Dest	GSEL# 120702 15:00 Other CPF UPS IR-2
<ol> <li>Shipping container/cooler arrive in good condition?</li> <li>Was sufficient ice used? (*See Note below)</li> <li>Were custody seals intact on sample bottles?</li> <li>Were custody papers (Chain of Custody) with samples?</li> <li>Were custody papers properly filled out?</li> <li>Were custody papers signed by the client and the lab?</li> <li>Were samples collected in containers provided by GSEL?</li> <li>Did all sample containers arrive in good condition?</li> <li>Were all container labels complete?</li> <li>Did all container labels agree with custody papers?</li> <li>Was sufficient sample sent for requested analysis?</li> <li>Were all samples received within holding times?</li> <li>Do VOA vials have zero headspace?</li> <li>Was preservation checked upon receipt?         <ul> <li>*VOA preservation checked after sample analysis.</li> <li>*Oil and Grease and TOC checked during sample analysis.</li> </ul> </li> <li>Was the correct preservative used?</li> </ol>	Yes No Not Present Yes No Not Required Yes No Not Present Yes No Not Present Yes No Not Present Yes No Not Present Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Initials OO  Yes No No Hone Received Yes No No Initials OO
Issues/Discrepancies:	
Person contacted about Issues/Discrepancies:	
nstructions:	

\*Note: In accordance with 40CFR Title 33:1 and TNI Standards samples that are delivered to the laboratory on the same day as collection may not meet the requirements of the temperature being at or below 6°C. In these cases, the samples shall be considered acceptable if the samples were received on ice and the cooling process has begun.

# SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR442 Use of this form is not an EPA/ADEO requirement. Attn: Water Div/NPDES Protection and Attn: Wat

(1) IDENCE INVENTED A PROPOSE A PROP	etreatment
(1) IDENTIFYING INFORMATION	
A. LEGAL NAME & MAILING ADDRESS	B. FACILITY & LOCATION ADDRESS
DD-T. 1 W 1 DD 4	
PJ's Tank Wash, DBA Sherman Bros, Trucking	PJ's Tank Wash
Po box 706 Harrisburg OR. 97466	2201 Hwy 82 West Crossett AR. 71635
= 5 501 7 50 Harrisbarg Orc. 57400	Crossett AR. /1635
C FACH ITY COVID OF D	
	EER: 870-364-7020 Email:BryanH@sbht.com
(2) REPORTING PERIOD-FISCAL YEAR From April 1st to	March 31 <sup>st</sup> (Both Semi-Annual Reports must cover Fiscal Year)
A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT
October & April	FROM: September 30 2021 TO: April 1 2022
(3) DESCRIPTION OF OPERATION	FROM: September 30 2021 TO: April 1 2022
(2) DESCRIPTION OF OFERATION	
A. REGULATED PROCESSES	B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES
Subparts	SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.
CHECK EACH APPLICABLE BLOCK	
✓ Tank Trucks/Chemical & Patroleum Corgo	PI's Tank Wash has disabarreed into the City of Co POTVI
✓ Tank Trucks/Chemical & Petroleum Cargo	PJ's Tank Wash has discharged into the City of Crossett POTW between September 30 2021 to April 1 2022 a continuous flow
☐ Rail Tank Cars/Chemical & Petroleum Cargo	from effluent holding. Test results are given to City engineer as
☐ Barges & Ocean/Sea Tankers/Chem & Petro Cargo	well as the City pulls separate periodic tests to insure limits are met.
☐ Tanks/Food Grade Cargos	
and the cause canges	
Comments:	
Tanker Trailers/Chemical	
Number of Regular Francisco	
C. Number of Regular Employees at this Facility	D. [Reserved]

# (4) FLOW MEASUREMENT

# INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge
Regulated	2825		Continuous
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW	2825		Continuous

<sup>&</sup>quot;Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(S) MEAGIPEMENT OF POLITICATE

(3) MEADOREMENT OF FOLLUTANTS	
A. TYPE OF TREATMENT SYSTEM	B. COMMENTS ON TREATMENT SYSTEM
CHECK EACH APPLICABLE BLOCK	
✓ Chemical Precipitation and Sedimentation	
□DAF	
☐ Filtration	
☐ Other_	
□ None	

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

Pollutant(mg/l)	Cu	Hg	O&G (SGT-HEM Method)
Max for 1 day	0.84	0.0031	<5.0
M. M.			
Max Measured	0.037	<0.0002	<5.0

40CFR442 SEMI-ANNUAL REPORT CON'D FACILITY NAME:
Sample Location _PJ's Tank Wash Crossett Ar. 71635
Sample Type (Grab or Composite)Grab
Number of Samples and Frequency Collected 2 times, Every 3 months
40CFR136 Preservation and Analytical Methods Use: x Yes □ No
(6) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]
() == - The interest (in 1990 [12 O.B.C. 1910] Clockly
6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.—The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever
feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.
The User may list any new or ongoing Pollution Prevention practices including Best or Environmental Management Practices,
Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:
All water used in the tank wash operation is contained and recycled or returned to the city sewer system. We have a residual Product Management Plan, which includes RCRA/DOT
class room testing and certification in accordance with 40 CFR part 264.16 and 49 CFR part
172.704. this training includes carefully segregating heels for determining proper disposal.
(7) GENERAL COMMENTS

# 40CFR442 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Bryan Hudson

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

Tank Wash Manager

OFFICIAL TITLE

70 77

ATE SIGNED