

**From:** [Belcourt, Jamie](#)  
**To:** "[Bryan Hudson](#)"; [Bart Sherman](#); [Kristopher Sherman](#); [Mitch Johnson](#); [randyc@sbht.com](mailto:randyc@sbht.com)  
**Cc:** [Wassell, Stacie](#); [Healey, Richard](#)  
**Subject:** RE: Semiannual Pretreatment Reports  
**Date:** Friday, July 1, 2022 12:25:11 PM  
**Attachments:** [image004.png](#)  
[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.

• Samples were noted to be preserved on ice, but arrived at the laboratory at a temperature of 14.4°C (57.9°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°C (69.2°F).

• 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  $\leq 6^{\circ}\text{C}$ . 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](mailto: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](mailto: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   |  |
|---|--|
| <p>A. LEGAL NAME &amp; MAILING ADDRESS</p> <p>PJ's Tank Wash, DBA<br/>Sherman Bros, Trucking<br/>Po box 706 Harrisburg OR. 97466</p>  | <p>B. FACILITY &amp; LOCATION ADDRESS</p> <p>PJ's Tank Wash<br/>2201 Hwy 82 West<br/>Crossett AR. 71635</p>  |
| <p>C. FACILITY CONTACT: Bryan Hudson      TELEPHONE NUMBER: 870-364-7020      Email: BryanH@sbht.com</p>  |  |
| (2) REPORTING PERIOD--FISCAL YEAR From April 1 <sup>st</sup> to March 31 <sup>st</sup> (Both Semi-Annual Reports must cover Fiscal Year)  |  |
| <p>A. MONTHS WHICH REPORTS ARE DUE</p> <p style="text-align: center;">October &amp; April</p>   | <p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: April 1 2021      TO: September 30 2021</p>   |
| (3) DESCRIPTION OF OPERATION  |  |
| <p>A. REGULATED PROCESSES</p> <p><u>Subparts</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input checked="" type="checkbox"/> Tank Trucks/Chemical &amp; Petroleum Cargo</p> <p><input type="checkbox"/> Rail Tank Cars/Chemical &amp; Petroleum Cargo</p> <p><input type="checkbox"/> Barges &amp; Ocean/Sea Tankers/Chem &amp; Petro Cargo</p> <p><input type="checkbox"/> Tanks/Food Grade Cargos</p> <p>Comments:</p> <p>_____ Tanker Trailers/Chemical</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> | <p>B. CHANGES:      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.</p> <p>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 well as the City pulls separate periodic tests to insure limits are met.</p> |
| <p>C. Number of Regular Employees at this Facility</p>  | <p>D. [Reserved]</p>   |

**(4) FLOW MEASUREMENT**

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

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

\*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

**(5) MEASUREMENT OF POLLUTANTS**

**A. TYPE OF TREATMENT SYSTEM**

CHECK EACH APPLICABLE BLOCK

- Neutralization
  - Chemical Precipitation and Sedimentation
- DAF
- Filtration
- Other \_\_\_\_\_
- None

**B. COMMENTS ON TREATMENT SYSTEM**

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<br>(SGT-HEM<br>Method) |
|-----------------|-------|--------|----------------------------|
| Max for 1 day   | 0.84  | 0.0031 | <5.0                       |
|                 |       |        |                            |
| Max Measured    | 0.196 | N/D    | <5.0                       |

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:  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; 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

(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 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

10-06-2021  
DATE SIGNED

# Gulf States Environmental Laboratories

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

Page 1 of 1

**Report Date:** 10/06/21  
**Sample ID:** WATER SAMPLE  
**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<br>(HEM) | 1340 - 09/30/21    | CSK     |

### METALS

**Sample Matrix:** LIQUID

| Analyte | Units: | 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

**Analyst:** LWZ

**Mercury Prep Method:** EPA 245.2

**Prep Date:** 10/01/21

**Analyst:** BDP

\*Sample subcontracted to NELAP certified lab #01955.

- 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

- TNTC - Too numerous to count
- E - Surrogate recovery unreportable due to dilution
- F - Matrix interference
- G - Method specific criteria not met
- H - Some of the QC was outside the normal range





# Gulf States Environmental Laboratories

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# 118941

Received By/Date and Time: CD 9-27-21 11:00

Sample Brought in By: Client \_\_\_\_\_ GSEL \_\_\_\_\_ Other UPS

Temperature: 20.7°C Thermometer ID: IR2

Logged in By: [Signature]

1. Shipping container/cooler arrive in good condition? Yes  No  Not Present
2. Was sufficient ice used? (\*See Note below) Yes  No  Not Required
3. Were custody seals intact on sample bottles? Yes  No  Not Present
4. Were custody papers (Chain of Custody) with samples? Yes  No
5. Were custody papers properly filled out? Yes  No  Not Present
6. Were custody papers signed by the client and the lab? Yes  No
7. Were samples collected in containers provided by GSEL? Yes  No
8. Did all sample containers arrive in good condition? Yes  No
9. Were all container labels complete? Yes  No
10. Did all container labels agree with custody papers? Yes  No
11. Was sufficient sample sent for requested analysis? Yes  No
12. Were all samples received within holding times? Yes  No
13. Do VOA vials have zero headspace? Yes  No  None Received
14. Was preservation checked upon receipt?  
\*VOA preservation checked after sample analysis.  
\*Oil and Grease and TOC checked during sample analysis.  
Yes  No  Initials CD
15. Was the correct preservative used? Yes  No

### Issues/Discrepancies:

Number 2 sample was not on ice.

### 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.

# Gulf States Environmental Laboratories

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

Page 1 of 1

**Report Date:** 03/29/22  
**Sample ID:** EFFLUENT  
**Collected By:** CLIENT  
**Time/Date Collected:** 1000 03/08/22  
**Date Received:** 03/11/22

## ANALYTICAL RESULTS

**GSEL ID#:** 120702

### METALS\*

**Sample Matrix:** LIQUID

| Analyte | Units | mg/L | Result    | Qualifier | Reporting Limit | Dil. Factor | Method    | Time/Date Analyzed | Analyst |
|---------|-------|------|-----------|-----------|-----------------|-------------|-----------|--------------------|---------|
| COPPER  |       |      | 0.037     |           | 0.003           | 1           | EPA 200.7 | 1658 - 03/22/22    | STS     |
| MERCURY |       |      | <0.000200 |           | 0.000200        | 1           | EPA 245.1 | 1041 - 03/23/22    | BXB     |

\*Sample subcontracted to NELAP certified lab #01997.

### 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) | 0933 - 03/17/22    | CSK     |

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

TNTC - Too numerous to count  
E - Surrogate recovery unreportable due to dilution  
F - Matrix interference  
G - Method specific criteria not met  
H - Some of the QC was outside the normal range



# Gulf States Environmental Laboratories

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

## SAMPLE RECEIPT FORM

Client: PT's Tank Wash GSEL# 120702

Received By/Date and Time: CO 3-11-22 15:00

Sample Brought in By: Client \_\_\_\_\_ GSEL \_\_\_\_\_ Other OF UPS

Temperature: 14.4°C Thermometer ID: IR-2

Logged in By: [Signature]

1. Shipping container/cooler arrive in good condition? Yes  No \_\_\_\_\_ Not Present \_\_\_\_\_
2. Was sufficient ice used? (\*See Note below) Yes  No \_\_\_\_\_ Not Required \_\_\_\_\_
3. Were custody seals intact on sample bottles? Yes \_\_\_\_\_ No \_\_\_\_\_ Not Present
4. Were custody papers (Chain of Custody) with samples? Yes  No \_\_\_\_\_
5. Were custody papers properly filled out? Yes  No \_\_\_\_\_ Not Present \_\_\_\_\_
6. Were custody papers signed by the client and the lab? Yes  No \_\_\_\_\_
7. Were samples collected in containers provided by GSEL? Yes  No \_\_\_\_\_
8. Did all sample containers arrive in good condition? Yes  No \_\_\_\_\_
9. Were all container labels complete? Yes  No \_\_\_\_\_
10. Did all container labels agree with custody papers? Yes  No \_\_\_\_\_
11. Was sufficient sample sent for requested analysis? Yes  No \_\_\_\_\_
12. Were all samples received within holding times? Yes  No \_\_\_\_\_
13. Do VOA vials have zero headspace? Yes  No \_\_\_\_\_
14. Was preservation checked upon receipt? Yes \_\_\_\_\_ No \_\_\_\_\_ None Received
- \*VOA preservation checked after sample analysis. Initials CO
- \*Oil and Grease and TOC checked during sample analysis.
15. Was the correct preservative used? Yes  No \_\_\_\_\_

Issues/Discrepancies:

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.

# 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

A. LEGAL NAME & MAILING ADDRESS

PJ's Tank Wash, DBA  
 Sherman Bros, Trucking  
 Po box 706 Harrisburg OR. 97466

B. FACILITY & LOCATION ADDRESS

PJ's Tank Wash  
 2201 Hwy 82 West  
 Crossett AR. 71635

C. FACILITY CONTACT: Bryan Hudson

TELEPHONE NUMBER: 870-364-7020

Email: BryanH@sbht.com

## (2) REPORTING PERIOD--FISCAL YEAR From April 1<sup>st</sup> to March 31<sup>st</sup> (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

October & April

B. PERIOD COVERED BY THIS REPORT

FROM: September 30 2021

TO: April 1 2022

## (3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

### Subparts

CHECK EACH APPLICABLE BLOCK

- Tank Trucks/Chemical & Petroleum Cargo
- Rail Tank Cars/Chemical & Petroleum Cargo
- Barges & Ocean/Sea Tankers/Chem & Petro Cargo
- Tanks/Food Grade Cargos

Comments:

\_\_\_\_\_ Tanker Trailers/Chemical

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

B. CHANGES: 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.

PJ's Tank Wash has discharged into the City of Crossett POTW between September 30 2021 to April 1 2022 a continuous flow from effluent holding. Test results are given to City engineer as well as the City pulls separate periodic tests to insure limits are met.

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        |

\*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

**(5) MEASUREMENT OF POLLUTANTS**

**A. TYPE OF TREATMENT SYSTEM**

CHECK EACH APPLICABLE BLOCK

- Neutralization
  - Chemical Precipitation and Sedimentation
- DAF
- Filtration
- Other \_\_\_\_\_
- None

**B. COMMENTS ON TREATMENT SYSTEM**

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<br>(SGT-HEM<br>Method) |
|-----------------|-------|---------|----------------------------|
| Max for 1 day   | 0.84  | 0.0031  | <5.0                       |
|                 |       |         |                            |
| Max Measured    | 0.037 | <0.0002 | <5.0                       |

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:  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; 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.**

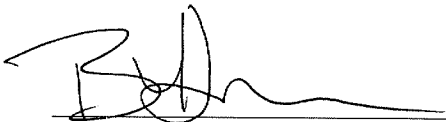
(7) GENERAL COMMENTS

(8) SIGNATORY REQUIREMENTS [40CFR403.12(I)]

**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

3-29-2022  
DATE SIGNED