

Peltier, Hannah

From: Gilliam, Allen
Sent: Tuesday, January 20, 2015 11:33 AM
To: Randy Coats
Cc: Fuller, Kim; Jerry Upchurch; Donald A. Thompson; jwadeharrison@yahoo.com; Peltier, Hannah
Subject: AR0001210_PJs Tank Wash ARP001053 April and Oct 2014 semi annual Pretreatment reports with ADEQ 2nd reply_20150120

Randy,

Hopefully the phone call this a.m. cleared up your understanding of PJ's Pretreatment reporting requirements under 40 CFR 403.12(e). It's understood PJ's has the correct form for its semi-annual reporting during the months of April and October of each year if there is any federally regulated wastewater discharged to the City of Crossett's sewage collection system.

It was agreed you'd send a certified statement to this office declaring PJ's Truck Wash has not discharged any Federally regulated wastewater into Crossett's sewage collection system during the calendar year 2014. This should bring PJ's "up to date" with its Pretreatment reporting requirements. Early 2014 attempts by this office to contact a PJ's representative had proved unsuccessful until this point.

Thank you in advance your cooperation.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Jeff Harrison, City of Crossett's Building Official

E/NPDES/NPDES/Pretreatment/Reports

From: Randy Coats [mailto:randyc@sbht.com]
Sent: Friday, January 16, 2015 4:30 PM
To: Gilliam, Allen
Cc: Jerry Upchurch; Donald A. Thompson
Subject: RE: AR0001210_PJs Tank Wash ARP001053 April and Oct 2014 semi annual Pretreatment reports with ADEQ reply_20150116

Hi Allen,

Even though I received your email today and called and left you a message, I went back and re-read an earlier email from you that said you'd be out of the office the rest of this week, so I'll answer some of your questions before we get to talk (which I assume will be next week).

First, the "bottom-line" question, No, we did not discharge any water to the Crossett sewage collection system in calendar-year 2014.

It is my fault that the "2nd permit" you refer to had the incorrect date range on it. That should have been our first permit and should have read October '13 thru March '14. Going back and reading the instructions, it is clear to me now that I simply misunderstood and frankly made a "dumb" mistake. I can send you a corrected version if you'd like so please

advise on that. I will tell you that our company went through a reorganization of duties about a year ago and lost some positions, which led to reporting of this type to now be done locally here, by me as it turns out, instead of at our corporate office in Harrisburg, Oregon.

It's true that I did call to get some clarifications on our requirements back on November 3rd 2014, according to my notes. I spoke to "Alex" there (didn't write down a last name) and now it's clear that we had a misunderstanding of our status. I've attached an email string that I sent that day after talking with Alex. I don't remember all of the conversation but definitely was told then that the rules had changed and we didn't need to file anything then, but would need to fill out a form in January of 2015 and keep it on file in the event that ADEQ requested to see it. This led to my email below, sent on the 9th of this month.

I'm looking forward to clearing this up and doing whatever is needed.

Please contact me at your convenience next week.

Thanks,

Randy Coats

Director of Operations

Liquid Bulk Division

Sherman Bros/Team Transport

870 862 5477 Direct

541 285 1028 Cell



"We will not let each other fail"

From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]

Sent: Friday, January 16, 2015 10:59 AM

To: Randy Coats

Cc: Fuller, Kim; Peltier, Hannah; Kreps, Alexander

Subject: AR0001210_PJs Tank Wash ARP001053 April and Oct 2014 semi annual Pretreatment reports with ADEQ reply_20150116

Hello Randy,

PJ's (dba Sherman Bros) 2nd 2014 annual was report received, but it was due in October 2014. This office will need the 1st 2014 semi-annual report due in the month of April. This 2nd semi-annual report indicates and you've certified "no discharge" to the City of Crossett's sewage collection system. Has PJ's discharged any wastewater from its interior truck tanks' washing during the calendar yr '14?

The next-to-last e-correspondence from from Sherman Bros (dated 5/14/13 from Donald Thompson w/you cc'd on it too) indicated "not discharging wastewater at this time". This is the same as what was just reported to Alex Kreps (wrong branch/contact), but is not due until April. You've again certified there's no wastewater discharged "at this time", but the report is dated through 4/30/15. This office may need an explanation of this prediction.

I'm not sure what form Alex Kreps said you had to submit for discharge of Federally regulated wastewater discharge , but the semi-annual report you filled out is the only wastewater (Pretreatment) form needed to be sent.

Since my counterpart, Rufus Torrence retired, I have no idea if PJ's chose to sample their wastewater for compliance with 40 CFR 442 @ http://www.ecfr.gov/cgi-bin/text-idx?SID=e9d9977c26d00bb544ee35c29a91aac4&node=pt40.30.442&rgn=div5#_top or chose the pollution management plan (PMP) in lieu of sampling per 40 CFR 442.16(b)(1)-(5). Would you please enlighten me which PJ's chose and Mr. Torrence agreed upon (in writing)?

It appears from correspondence received 10/30/06, PJ's chose the treatment option.

If you chose the PMP, you'd have to have records on file at your facility showing compliance with the procedures/record-keeping required in CFR 442.16(b)(4)&(5)(i)-(x). This agency could request these record-kept documents if so desired. If you'd look closely at the PMP, you'd probably see some procedures and recordkeeping PJ's is already conducting.

Bottom line for the calendar year '14, did PJ's discharge any truck tanks' wash/wastewater into Crossett's sewage collection system?

We may need to arrange for a phone conversation regarding PJ's compliance status.

Sincerely,

Allen Gilliam

ADEQ State Pretreatment Coordinator

501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Randy Coats [<mailto:randyc@sbht.com>]

Sent: Friday, January 09, 2015 2:09 PM

To: Kreps, Alexander

Subject: ADEQ report for PJ's Tank Wash

Hi Alex,

Per our phone conversation, this is the form we've filled out every six months in the past. In Novemeber of 2014 we talked and there's now a form that needs to be filled out and kept on file to present if requested.

Can you tell me which form it is that's now required?

Thanks,

Randy Coats

Director of Operations

Liquid Bulk Division

Sherman Bros/Team Transport

870 862 5477 Direct

541 285 1028 Cell



"We will not let each other fail"

Thank you, Allen. The semi-annual reports were completed by us and to my knowledge sent, but apparently not to the correct location. Please see the attached and contact me at your convenience when you return. I look forward to clearing this up.

Randy Coats

Director of Operations

Liquid Bulk Division

Sherman Bros/Team Transport

870 862 5477 Direct

541 285 1028 Cell

From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]

Sent: Monday, January 12, 2015 10:00 AM

To: Kreps, Alexander; Randy Coats

Cc: Fuller, Kim; Healey, Richard

Subject: RE: ADEQ Semi-Annual Report - Crossett, Sherman Bro. Truck Wash semi-annual reports per 40 CFR 442

Thanks Alex,

Mr. Coats? Sherman Brothers' last contact logged into (now retired) Rufus Torrence's spreadsheet was Mark Phillips. A mass e-mail was sent out to all of his Federally regulated facilities from this office went out on 1/9/14. 'markp@sbht.com' was on this list advising semi-annual (or periodic) reports were to be sent to this office.

Sherman Bro's semi-annual reports are due to this office during the months of April & October of each yr, "zero discharge" (certification) or not to Crossett's POTW. This office has neither for the 2014 reporting year.

I'll be out the rest of this week. We should make contact after that to determine Sherman Bro's compliance with the Federal Pretreatment Regs.

Thanks for your cooperation,

Allen Gilliam

ADEQ State Pretreatment Coordinator

501.682.0625

ec: Richard Healey, NPDES Enforcement Branch Manager