

Peltier, Hannah

From: Gilliam, Allen
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
Attachments: ADEQ report for PJ's Tank Wash

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 November 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

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 97446

B. FACILITY & LOCATION ADDRESS

PJ'S TANK WASH
2201 HWY 82 WEST
CROSSETT, AR

C. FACILITY CONTACT:

TELEPHONE NUMBER:

(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

OCTOBER & APRIL

B. PERIOD COVERED BY THIS REPORT

FROM: 10-1-14 TO: 4-30-15

(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:

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.

C. Number of Regular Employees at this Facility

8

D. [Reserved]

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

(4) FLOW MEASUREMENT

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

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

*"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						
Max for 1 day	0.84	0.0031	26						
Max Measured									

Sample Location _____

Sample Type (Grab or Composite) _____

Number of Samples and Frequency Collected _____

40CFR136 Preservation and Analytical Methods Use: Yes No

FACILITY IS NOT DISCHARGING WASTE WATER AT THIS TIME. PJ'S IS UPDATING TREATMENT SYSTEM AND PLANS TO COMMENCE DISCHARGING TO POTW IN THE FUTURE.

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. [Reserved]

[Reserved]

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____ of

_____ a corporation, known to me to be the person whose name is subscribed to the foregoing instrument(s), and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this _____ day of _____, 200__.

Notary Public in and for _____
County, Arkansas

My commission expires _____.

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

(7) 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:

(8) GENERAL COMMENTS

(9) SIGNATORY REQUIREMENTS [40CFR403.12(l)]

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.

RANDY COATS

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

DIRECTOR OF OPERATIONS

OFFICIAL TITLE

Randy Coats

SIGNATURE

10-28-14

DATE SIGNED