

ADEQ

ARKANSAS
Department of Environmental Quality

February 22, 2016

Randy Coats, Director of Operations
PJ'S Tank Wash
2201 Hwy 82 West
Crossett, AR 71635

RE: PJ'S Tank Wash Inspection (Ashley Co)
AFIN: 02-00086 NPDES Permit No.: ARR000693

Dear Mr. Coats:

On January 26, 2016, I performed an Industrial Stormwater (No-Exposure) Inspection of the above-referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e., photos) is due by **March 7, 2016**.


If I can be of any assistance, please contact me at youngm@adeq.state.ar.us or (501) 837-2073.

Sincerely,



Michael D. Young
District 8 Field Inspector
Water Division

cc: Allen Gilliam, ADEQ State Pretreatment Coordinator
ADEQ Hazardous Waste Division

 A R K A N S A S Department of Environmental Quality	WATER DIVISION INSPECTION REPORT				
	AFIN: 02-00086	PERMIT #: ARR000693	DATE: 1/26/2016		
	COUNTY: 02 Ashley	PDS #: 089228	MEDIA: WN		
	GPS LAT: 33.140609 LONG: -91.987122 LOCATION: Entrance				
FACILITY INFORMATION		INSPECTION INFORMATION			
NAME: PJ'S Tank Wash LOCATION: 2201 Hwy 82 West CITY: Crossett, AR 71635		FACILITY TYPE: 2 - Industrial INSPECTOR ID#: 101531 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Industrial Stormwater			
RESPONSIBLE OFFICIAL		DATE(S): 1/26/2016 ENTRY TIME: 10:00 EXIT TIME: 10:57 PERMIT EFFECTIVE DATE: 1/11/2011 PERMIT EXPIRATION DATE: 6/30/2019			
NAME / TITLE: Randy Coats / Director of Operations COMPANY: PJ'S Tank Wash MAILING ADDRESS: 2201 Hwy 82 West CITY, STATE, ZIP: Crossett AR 71635 PHONE & EXT. / FAX: 870-364-7020 / EMAIL:		FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: No		INSPECTION PARTICIPANTS			
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Clark Reed/Shop Manager/870-364-7020 Bryan Hudson/Facility Manager/870-364-7020 Cody Brickley/Tank Wash Manager/870-364-7020			
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
S	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT
M	OTHER: No Exposure				
SUMMARY OF FINDINGS					
<p>1.) The facility does not currently satisfy the No-Exposure exclusion. This is a violation of permit condition Part 1.7. The following issues were noted that violate the No-Exposure exclusion:</p> <ul style="list-style-type: none"> • Scrap metal and old tanks are exposed to stormwater (see Photo 1). • Barrels with unknown contents were stored outside exposed to stormwater with no secondary containment (see Photos 2-3). • Barrels of Ferric Chloride used in treatment of wash water are stored outside exposed to stormwater with no secondary containment (see Photo 4). • There was evidence of spilled materials not immediately cleaned up (see Photo 4-5). • The secondary containment wall around the clarifier and storage tanks for treated wastewater is currently not completed. 					

GENERAL COMMENTS


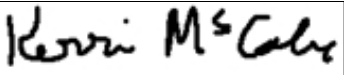
On January 26, 2016 I performed a compliance inspection at PJ's Tank Wash in Crossett, AR. The facility is covered under the No-Exposure exclusion in Part 1.7 of the Industrial Stormwater General Permit (IGP). The facility is also a categorical facility that requires pretreatment prior to any discharge to the City of Crossett. Currently, the facility transports wash water to an injection well to dispose wastewater. The facility desires to pretreat the wash water to satisfy condition of the City of Crossett Pretreatment requirements.

I contacted Clark Reed and Brian Hudson with PJ's Tank Wash and informed them I was performing a compliance inspection for their No-Exposure condition. Mr. Reed stated that the facility had been submitting quarterly reports marked "No Discharge" to Allen Gilliam, ADEQ State Pretreatment Coordinator, with the remark that they have been in preparation to construct a pretreatment unit, but currently pay to dispose of all the wastewater from the tank washing process. I was informed upon arrival that the unit had been constructed and was operational. However, the facility was awaiting water quality analysis results and approval from the City of Crossett, who satisfies the pretreatment requirements as required by an agreement between Georgia-Pacific (AR0001210), who holds the permit for the wastewater discharged from City of Crossett WWTP. I informed Mr. Reed and Mr. Hudson that I would first perform the No-Exposure inspection and then document the pretreatment device and copy Allen Gilliam on my report. Also included is ADEQ Hazardous Waste Division.

The facility primarily sees a heavy amount of truck traffic as tankers await washing. However, it was stated that the previous owner left materials such as scrap metal, old tanks, decommissioned trailers, and some barrels of unknown liquids (see Photos 1-3). Having these items exposed to stormwater is a violation of the No Exposure condition of the IGP. These materials need to be placed in a covered area or disposed of properly. Additionally, the facility had barrels of Ferric Chloride used in the treatment of wash water that had no secondary containment (see Photo 4). Spills were also observed (see Photos 4-5) that had not been immediately cleaned up and properly remediated. The new treatment process adds additional exposure of materials that are prone to pollution (i.e., chemicals, overflows, releases, sludge storage, etc.), and these materials must be kept in secondary containment or not exposed to rainfall and stormwater. Spills are to be cleaned up immediately when observed or identified.

I asked to be walked through the treatment system to identify any potential pollution issues with stormwater and to relay the information on the treatment process to Allen Gilliam. The process begins immediately after washing a tanker (see Photo 6). This water is treated with Sulfuric Acid for pH adjustment (see Photos 7-8). The room where this takes place is covered, and spilled materials are pumped back into the treatment unit. The wastewater leaves the pH adjustment and enters the clarifier (see Photos 12-16) where it is dosed with Ferric Acid as a coagulant and runs through mixing and settling processes. Any spilled materials or releases from the clarifier were stated to be routed back into the clarifier using a sump pump (see Photos 10-11). The secondary containment wall was not finished at the time of inspection. After coagulant treatment, the treated water is stored in tanks in the secondary containment area (see Photos 18-19). A sample of the wastewater was pulled from the mixing zone of the clarifier to demonstrate the settling (see Photo 17). Sludge from the treatment process is pumped into a storage container that is in a loading dock that is covered (see Photo 20). Any released material is captured in the loading dock and pumped back into the treatment unit (see Photo 21). I had concerns that this area could be prone to pollution and would need to be diligently checked to ensure there are no releases from this area. Storage containers of sludge are covered and remain until hauled off to be disposed of (see Photo 22). There was sawdust and other materials spilled in this area that needs to be immediately cleaned up.

As a response to this inspection report, ADEQ Water Division Inspection Branch requires photographs of the areas where spills were observed are cleaned up and properly remediated. Photos of the piles of scrap metal no longer exposed are also needed with the response. A timeframe of when secondary containment will be reestablished in the clarifier area needs to also be included. Barrels of chemicals need to be in secondary containment or not exposed to stormwater. Photos of this corrective action are also required.

INSPECTOR'S SIGNATURE:  Michael Young	DATE: 2/18/2016
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 2/22/2016

Inspection Form Legend:

S = Satisfactory, M = Marginal, U = Unsatisfactory, Y = Yes, N = No, NI = Not Implemented, NA = Not Applicable, NE = Not Evaluated –

If Y and a NI are check it means it is in the SWPPP but not implemented in the field which is a violation.

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

Comments: Facility has No-Exposure exclusion.

No-Exposure Exclusion Verification

Are any of the following materials or activities exposed to precipitation now or in the foreseeable future?

Answering "Yes" to any of these questions indicates the facility is not eligible for the No-Exposure exclusion.

a. Using, storing, or cleaning industrial machinery or equipment and areas where residuals from using, storing, or cleaning industrial machinery or equipment remain and are exposed to stormwater?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
b. Are materials or residuals on the ground or in stormwater inlets from spills/leaks?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
c. Are materials or products from past industrial activity exposed?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
Comments: <u>Scrap metals, tanks, and unknown chemicals are stored exposed to stormwater.</u>	
d. Is material handling equipment exposed except adequately maintained vehicles?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
e. Are materials or products during loading/unloading or transporting activities exposed?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
f. Materials or products stored outdoors except final products intended for outside use (e.g., new cars) where exposure to stormwater does not result in the discharge of pollutants?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
Comments: <u>Chemicals for treatment are stored with no secondary containment.</u>	
g. Materials contained in open, deteriorated, or leaking storage drums, barrels, tanks, and similar containers?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
h. Materials or products handled/stored on roads or railways owned or maintained by the discharger?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
i. Waste materials exposed except waste in covered, non-leaking containers (e.g., dumpsters)?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
Comments: <u>Sawdust on the ground around covered sludge storage container.</u>	
j. Application or disposal of process wastewater unless otherwise permitted?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
k. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	

General Comments:

The facility has scrap metals, unknown liquids, and treatment chemicals exposed to stormwater. Additionally, there were several spills identified that have not been immediately cleaned or remediated.

Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:53		Photo #:
Witness:	Brian Hudson; Clark Reed; Cody Brickley		1
Description:	Scrap metal and old tanks exposed to stormwater.		



Photographer:	Michael Young	Date:	01/26/2016
Time:	10:34		Photo #:
Witness:	Brian Hudson; Clark Reed; Cody Brickley		2
Description:	Barrels with unknown contents exposed to stormwater with no secondary containment.		



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:34	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	3	Description:	Barrel with unknown contents exposed to stormwater.



Photographer:	Michael Young	Date:	01/26/2016
Time:	10:26	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	4	Description:	Ferric Chloride 42BE stored outside secondary containment. Also note spilled materials around barrels.



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:21	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	5	Description:	Sawdust used as bulking material with sludge from wash water. Sawdust was spilled on ground and not immediately cleaned up.



Photographer:	Michael Young	Date:	01/26/2016
Time:	10:28	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	6	Description:	Wash water immediately after washing tanks. Prior to pretreatment.



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:28	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	7	Description:	Initial unit used for pH adjustment. Sulfuric Acid is dosed into the water.



Photographer:	Michael Young	Date:	01/26/2016
Time:	10:28	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	8	Description:	Wash water in Sulfuric Acid dosing chamber. Wash water is stated to be alkaline.



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:15	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	9	Description:	Wash water exits pH adjustment and enters clarifier where Ferric Chloride is dosed as coagulant. Secondary concrete containment contains sump pump.



Photographer:	Michael Young	Date:	01/26/2016
Time:	10:15	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	10	Description:	Ferric Chloride dosing. Red circled area is sump pump for spills and releases in which water is routed back into the clarifier.



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:15	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	11	Description:	Close-up view of sump pump for releases and spills in treatment area. Cup of Ferric Chloride pictured.



Sump pump delivering spills and leaks back into system.

Photographer:	Michael Young	Date:	01/26/2016
Time:	10:17	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	12	Description:	Water entering dosing area after pH adjustment.



01.26.2016 10:17

Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash				
Photographer:	Michael Young	Date:	01/26/2016	Time:	10:17
Witness:	Brian Hudson; Clark Reed; Cody Brickley			Photo #:	13
Description:	Ferric Chloride dosing area.				



Photographer:	Michael Young	Date:	01/26/2016	Time:	10:17
Witness:	Brian Hudson; Clark Reed; Cody Brickley			Photo #:	14
Description:	Mixing zone for coagulant.				



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash				
Photographer:	Michael Young	Date:	01/26/2016	Time:	10:17
Witness:	Brian Hudson; Clark Reed; Cody Brickley			Photo #:	15
Description:	Initial clarifier run after Ferric Chloride treatment.				



Photographer:	Michael Young	Date:	01/26/2016	Time:	10:17
Witness:	Brian Hudson; Clark Reed; Cody Brickley			Photo #:	16
Description:	Water in clarifier after treatment.				



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:17	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	17	Description:	Sample of water in mixing zone.



Photographer:	Michael Young	Date:	01/26/2016
Time:	10:16	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	18	Description:	Storage tanks for treated wash water. Currently hauling to ground injection well.



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:16	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	19	Description:	Additional storage tanks for treated wastewater. In secondary containment.



Photographer:	Michael Young	Date:	01/26/2016
Time:	10:18	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	20	Description:	Sludge storage area is covered and has secondary containment with sump pump.



Water Division Photographic Evidence Sheet

Location:	PJ'S Tank Wash		
Photographer:	Michael Young	Date:	01/26/2016
Time:	10:18	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	21	Description:	Area of concern with sludge storage, but staff assured that the area is pumped daily.



Photographer:	Michael Young	Date:	01/26/2016
Time:	10:20	Witness:	Brian Hudson; Clark Reed; Cody Brickley
Photo #:	22	Description:	Sludge storage container is hauled to landfill and remains covered until disposal.



Figure 1. Overview of PJ'S Tank Wash in Crossett, AR. Locations identified are the installation area for the clarifier and sludge storage area, piles of scrap metal, and barrels of liquid stored outside.

