

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Monday, May 09, 2016 12:47 PM  
**To:** 'Randy Coats'  
**Cc:** Kristopher Sherman; Jerry Upchurch; Bryan Hudson; Gage, Hannah; Leamons, Bryan; 'crossettbdgoff@windstream.net'  
**Subject:** AR0001210\_PJs Tank Wash ARP001053 late April 2016 semi annual Pretreatment report\_20160509  
**Attachments:** ADEQ semi-annual report April 2016(3).pdf; Arkansas Analytical Report for Pj's Tank for Permit Work \_0258.pdf

Randy,

PJ's Tank Wash April 2016 semi-annual Pretreatment report was received, reviewed, deemed complete and compliant with the Federal Pretreatment reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Transportation Equipment Cleaning pretreatment standards in 40 CFR 442.16.

Please keep in mind PJ's (dba Sherman Brothers) semi-annual reports are due during the months of April and October of each year. Sampling should take place at the beginning or before the reporting month to help ensure timely reporting.

This office would need to be knowledgeable if the City requires more frequent reporting and/or other limiting parameters along with the legal/technical basis for their limitations and public notice.

There are no further requirements deemed necessary at this time.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Jeff Harrison, City of Crossett, Public Works Director

E/NPDES/NPDES/Pretreatment/Reports

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**From:** Randy Coats [<mailto:randyc@sbht.com>]  
**Sent:** Thursday, May 05, 2016 5:41 PM  
**To:** Gilliam, Allen  
**Cc:** Kristopher Sherman; Jerry Upchurch; Bryan Hudson  
**Subject:** RE: PJ's semi-annual report

Allen,

Please see attached, our amended report which includes information in section (4) in the "regulated" process line, and also the attached lab analysis updates from an Arkansas certified lab. Please let me know if there are any additional requirements.

Thanks,

***Randy Coats***

Director of Operations  
Liquid Bulk Division

Sherman Bros/Team Transport  
800 547 8980 Direct  
541 285 1028 Cell



*"We will not let each other fail"*

# 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 71635

C. FACILITY CONTACT: Bryan Hudson

TELEPHONE NUMBER: 870 364 7020

(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: October 1, 2015 TO: March 31, 2016

A (3) DESCRIPTION OF OPERATION

Tank truck cleaning facility

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:

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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 began discharging water to city of Crossett POTW in February of 2016. For this reporting period, water was discharged twice, once on February 10<sup>th</sup> and again on March 4<sup>th</sup>.

A new schematic and process description has been supplied to Allen Gilliam at ADEQ. Batch discharging is currently done within 24 hour windows, after Jeff Harrison at city of Crossett reviews and accepts lab results of treated water as within acceptable limitations.

C. Number of Regular Employees at this Facility 8

D. [Reserved]

**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge
Regulated		56000 gallons total	2x batches of treated water
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW		56000 gallons total	2x batches of treated water

\*"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 (SGT-HEM Method)
Max for 1 day	0.84	0.0031	26
Max Measured	0.00593	<0.0002	<16.3

Sample Location \_\_\_\_\_ Effluent tank piping (after treatment) \_\_\_\_\_

Sample Type (Grab or Composite) \_\_\_\_\_ Grab \_\_\_\_\_

Number of Samples and Frequency Collected \_\_\_\_\_ 2 during reporting period, prior to discharge \_\_\_\_\_

40CFR136 Preservation and Analytical Methods Use:  Yes  No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. [Reserved]

[Reserved]

CORPORATE ACKNOWLEDGEMENT (Optional)

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

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 \_\_\_\_\_.

**(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:

All water used in tank wash operation is contained and recycled or returned to the city sewer system. We have instituted a Residual Product Management Plan, which included RCRA/DOT classroom training, testing and certification in accordance with 40 CFR Part 264.16 and 49 CFR Part 172.704. This training included carefully segregating heels for determining proper disposal.

**(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 W. COATS

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

DIRECTOR OF OPERATIONS

OFFICIAL TITLE



SIGNATURE

5/6/16

DATE SIGNED



8100 National Dr. - Little Rock, AR 72209  
501-455-3233 Fax 501-455-6118

05 May 2016

Robert Smith  
ATS Scientific Group, LLC  
P.O. Box 11000  
El Dorado, AR 71730

Project: PJ's Tank Wash -- Crossett, AR  
Project Number: 49-4132 -- April 2016  
SDG Number: 1604472

Enclosed are the results of analyses for samples received by the laboratory on 29-Apr-16 09:36. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

<u>Custody Seals</u>	✓
<u>Containers Correct</u>	✓
<u>COC/Labels Agree</u>	✓
<u>Received On Ice</u>	
Temperature on Receipt	21.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James / Teresa Coins".

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Norma James and/or Teresa Coins  
Technical Director and/or QA Officer

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05 May 2016



Robert Smith  
ATS Scientific Group, LLC  
P.O. Box 11000  
El Dorado, AR 71730  
Project: PJ's Tank Wash -- Crossett, AR  
Project Number: 49-4132 -- April 2016  
Date Received: 29-Apr-16 09:36

**CASE NARRATIVE**

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Sample Delivery Group – 1604472

**One OR more of the qualifiers described below may appear in this report.**

**ANALYTICAL QUALIFIERS:**

<u>Qualifier</u>	<u>Description</u>
EDL	Result was non-detect at an elevated detection limit due to one or more of the following: Sample Matrix, Sample Dilution, or Limited Sample Volume.
EX	Result exceeds DAILY MAXIMUM and/or MONTHLY AVERAGE.
EX2	The result exceeds the TCLP limit.
J	At client request, J-Values are reported. J-Values are considered "estimated" results as they are below the limit of quantitation yet above the method detection limit (MDL).
N	Insufficient sample volume received as required by the method.
T40	The ambient temperature exceeded 23 +/- 2°C during the TCLP rotation process.

05 May 2016



Robert Smith
ATS Scientific Group, LLC
P.O. Box 11000
El Dorado, AR 71730
Project: PJ's Tank Wash -- Crossett, AR
Project Number: 49-4132 -- April 2016
Date Received: 29-Apr-16 09:36

ANALYTICAL RESULTS

Lab Number: 1604472-01
Sample Name: Effluent 1
Date/Time Collected: 4/27/16 10:40
Sample Matrix: Water

Table with 7 columns: Total Metals, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Rows include Copper and Mercury under Total Metals, and Oil and Grease under Wet Chemistry.

QUALITY CONTROL RESULTS

Wet Chemistry -- Batch: B604461 (Water)
Prepared: 29-Apr-16 14:52 By: CAS -- Analyzed: 02-May-16 15:09 By: CAS

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row for Oil and Grease.

Total Metals -- Batch: B605028 (Water)
Prepared: 02-May-16 16:20 By: HF -- Analyzed: 03-May-16 15:37 By: HF

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row for Copper.

Total Metals -- Batch: B605060 (Water)
Prepared: 04-May-16 12:19 By: ST -- Analyzed: 04-May-16 14:55 By: ST

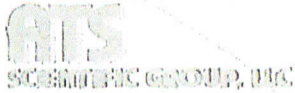
Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row for Mercury.

QUALIFIER(S)

\*EDL: Elevated Detection Limit Due to one or more of the following: Sample Matrix, Sample Dilution, or Limited Sample Volume

All Analysis performed according to EPA approved methodology when available:
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by: [Signature]
Norma James and/or Teresa Coins
Technical Director and/or QA Officer



**Chain of Custody  
For  
Lab Testing**

PO Box 11000  
El Dorado, AR 71730  
1-800-617-9115

1604472 -01

<b>Customer:</b> ATS Scientific Group LLC	<b>P.O. #</b> 13161	<b>Project ID:</b> P5 <sup>th</sup> JAWK 49-4132
<b>Contact &amp; Title:</b> Mr. Robert Smith	<b>Accounting Contact:</b>	<b>Standard / Rush:</b> CROSSETT, AR
<b>Shipping Address:</b> 1906 West Hillsboro Cir	<b>Billing Address:</b> PO Box 11000	<b>Samples by:</b> CHAT
<b>City, State, Zip:</b> El Dorado AR 71730	<b>City, State, Zip:</b> El Dorado AR 71730	<b>Picked up by:</b> ATS Scientific Group, LLC
<b>Phone:</b> 870-881-8290	<b>Phone:</b>	<b>Delivered by (Carrier):</b> SHIP UPS Next Day
<b>Fax:</b> 870-881-8292	<b>Fax:</b>	<b>Salesman:</b>
<b>E-mail:</b> bob@ats-science.com	<b>E-mail:</b> ARJAX@ats-science.com	<b>Field / In-house Tech:</b> R Smith

Lab Use	Sample Collection				All Samples Are To Be Stored at 4 Degrees Centigrade																						
Sample #	Date	Time	Comp / Grab	Source	Analysis Required	Cont.	Preservative	Matrix	Notes																		
	4/27/16	10:40	Grab	EFFluent	Total Mercury		HNO <sub>3</sub>	Water	JIS# 191272																		
	4/27/16	10:40	Grab	EFFluent	Total Copper		HNO <sub>3</sub>	Water	JIS# 191272																		
	4/27/16	10:40	Grab	EFFluent I	Oil (Grade Hex Fluor)		HCL	Water	JIS# 191253																		
<table border="0"> <tr> <td>Custody Seals:</td> <td>Yes</td> <td>No</td> </tr> <tr> <td>Containers Correct:</td> <td>X</td> <td></td> </tr> <tr> <td>COC/Labels Agree:</td> <td>X</td> <td></td> </tr> <tr> <td>Received on Ice:</td> <td></td> <td>X</td> </tr> <tr> <td>Temperature on Receipt:</td> <td colspan="2">21°C</td> </tr> <tr> <td>Temperature Gun ID:</td> <td colspan="2">HHT # 2</td> </tr> </table>										Custody Seals:	Yes	No	Containers Correct:	X		COC/Labels Agree:	X		Received on Ice:		X	Temperature on Receipt:	21°C		Temperature Gun ID:	HHT # 2	
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**Additional Notes:** Report should be titled P5<sup>th</sup> Jaw Wash CROSSETT Arkansas  
E/O ATS Scientific Group, LLC Project # 49-4132

Shipped UPS Next Day

<b>Relinquished by:</b> R Smith	<b>Date:</b> 4/28/16	<b>Time:</b> 13:20	<b>Received by:</b>	<b>Date:</b>	<b>Time:</b>
<b>Relinquished by:</b>	<b>Date:</b>	<b>Time:</b>	<b>Received by:</b>	<b>Date:</b>	<b>Time:</b>
<b>Relinquished by:</b>	<b>Date:</b>	<b>Time:</b>	<b>Received by:</b> Jammy Riddle	<b>Date:</b> 4/29/16	<b>Time:</b> 9:36

Via-UPS