



Industrial User Facility Inspection Report

U.S. EPA, Region 8

Name of industry and location:

Quala Wash Holdings LLC
3029 Salt Creek Highway
Casper, WY 82601

Control Authority / NPDES Permit No.

City of Casper
NPDES Permit No. WY-0021920

IU – NPDES ID

WYPU00001

Date of visit:

July 18, 2023

Approximate Time of visit:

1330 – 1500

Name(s) / Affiliation / email of inspector(s):U.S. EPA:

Al Garcia, garcia.al@epa.gov

City of Casper:

Randy Ogden, rogden@casperwy.gov

General Facility Information:Representatives at Inspection:

- Joe Holcomb – Tank Wash Facilities Manager, joe.holcomb@quala.us.com

Type of Business Operations:

- Tanker and Truck Wash for chemical, crude and fuel transportation.

Facility Information (truck/tanker wash):

- 2 to 3 employees
- one daily shift
- Days of Operation: five days per week, Monday through Friday

Inspection Description:

Al Garcia from the U.S. Environmental Protection Agency (EPA) and Randy Ogden from the City of Casper conducted an oversight significant industrial user (SIU) inspection of the Quala Wash Holdings LLC (the facility) in Casper, WY. The SIU inspection was conducted as part of the EPA Pretreatment audit of the City of Casper's Publicly Owned Treatment Works (POTW) Pretreatment Program and is intended to provide a general overview of the facility to ensure the Pretreatment records reviewed by EPA adequately address current conditions at the facility. The EPA oversight SIU inspection consisted of an evaluation of the wastestreams generated from the unit operations and processes at the facility, including potential for spills and slug discharges. The facility discharges to the sewer collection system leading to the City of Casper's POTW.

Upon arriving at the facility on July 18, 2023 at approximately 13:30 p.m., Al Garcia of the EPA presented credentials to the facility representative and explained the purpose of the inspection. During the opening interview, the facility representative provided an overview of the operations and processes at the facility, as well as information regarding wastestreams generated from these unit operations and management of these

wastestreams. The opening interview was followed by a facility tour to visually inspect the unit operations. The EPA conducted a closing conference to discuss potential findings and recommendations identified during the inspection.

Process Description:

Quala Wash Holdings LLC is a tanker and truck washing facility that provides both interior and exterior washing for truck tankers, IBC totes, and iso tanks associated with the transport of crude, chemical and fuel materials. The facility washes about 2 to 3 tankers per day. The facility has established a **Do Not Clean** list for restricted materials that are not allowed to be washed.

The tankers or other vessels to be cleaned are first vented and emptied of residual material in the tank. The tanker may contain residual material that is considered RCRA empty and contain less than 10% of the tanker capacity. The material is collected in temporary totes and may be provided back to the trucking company, reused or hauled off-site. Based on observations during the facility walk-through, the operator collects the material in 5-gallon buckets and manually transfers this material to the designated collection vessel, a bucket at a time. Based on observations of the process floor, it appears that spills occur during the manual collection of the residual material in the tanks and during transfer to the collection vessel.

The cleaning detergents, petrol degreasers and other cleaning supply are each mixed in 275 or 550-gallon IBC totes and are pumped to a manifold and dispersed through 2-inch lines to 10 different wash heads located in the truck washing bays. Depending on the size and configuration of the tanker, large or small spinners are attached to these wash heads and are lowered into the tanker for the cleaning cycle.

A typical tanker wash for chemical and fuel tankers or vessels is the following:

- Hot water flush – 15 seconds
- Breakaway detergent circulating cycle – 20 minutes.
- Three hot water flushes (15 seconds each)
- Two cold water flushes (15 seconds each)

According to Mr. Holcomb, the wash cycle generates about 150 gallons of wastewater. The crude tankers use the following wash cycle: (**Note:** various wash cycles are established for the different types of vessels and contents washed at the facility.)

- Diesel flush to break up the crude residual, using red dye diesel contained in 275-gallon totes and a pneumatic pump. A tanker will receive approximately a 5-gallon diesel flush.
- Steam to 140° F (Note: the facility has established a **Do Not Heat** list for restricted materials)
- Hot water flush (15 seconds)
- Petrol detergent circulating cycle (20 minutes)
- Three hot water flushes (15 seconds each)
- Two cold water flushes (15 seconds each)
- The wastewater from this cleaning cycle

According to Mr. Holcomb, the facility also provides a tanker exterior brightener using an Aluma bright chemical to etch the exterior metal to degrease and brighten. The supply chemical is pumped through a 2-way valve and to a wand attached to a 50-foot hose.

The wastewater generated from both the interior or exterior washing operations are collected in a trench located in the wash bays. The trench leads to a below-grade sump. In addition to the generated wastewater and because of the nature of the truck and tanker washing process, there is a significant amount of oily

substances on the floor. These spills to the floor are also collected in the trench leading to the wastewater sump.

The sump has an active oil rope skimmer to collect excess oil. The contents of the floor sump are either pumped to the 16,000-gallon discharge tank or pumped to the above-grade oil/water separator. The operator sends the sump contents to either the waste discharge tank or to the oil/water separator. When Mr. Holcomb was asked the criteria used to determine which treatment system to pump the wastewater, he stated that it is dependent on visual observation of the wastewater in the sump.

The oil water separator is approximately 6' x 5' x 13' in dimension and has been pumped out twice so far in 2023, according to Mr. Holcomb. The waste discharge tank is maintained at a pH of 6 to 10. HCL and NaSO₄ barrels are stored next to the tank for pH neutralization, if necessary. The tank is aerated for about 20 minutes when pH neutralization occurs. The contents of the discharge tank are discharged to the City at a certain level, estimated to be about 200 barrels in volume or 50% capacity of the tank. A discharge of the tank takes about 5 to 10 minutes.

EPA Classification of the Industrial User

The facility performs tanker and transportation vessel interior and exterior washing operations. The City has determined that this wastestream is subject to its local limits and has permitted the facility as an SIU, subject to the Pretreatment Regulation found in the City's ordinance and 40 C.F.R. Part 403.

The facility also provides exterior truck washing to etch and brighten the metal skin of the truck tanker. The facility may be subject to the Metal Finishing Regulations found in 40 C.F.R. Part 433, if this brightening chemical is acidic.

Summary of Findings

Quala Wash Holdings LLC

NPDES ID# WYPU00001

July 18, 2023

Pretreatment Inspection Findings	Follow up Action Items
The facility performs brightening of truck exteriors using an Aluma bright chemical. The use of acids to brighten trucks may be subject to the Metal Finishing categorical Pretreatment Standards found in 40 C.F.R. § 433.	<u>Pretreatment Requirement</u> 40 C.F.R. § 433 <u>Corrective Actions</u> Provide the Safety Data Sheet to the City of Casper to evaluate the composition of the exterior brightening chemical.
The Pretreatment regulations found at 40 C.F.R. § 403.8(f)(2)(vi) require the City to Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For purposes of this subsection, a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions. Based on information gathered during the facility inspection, the operator determines if the wastewater collected in the wastewater sump is pumped to either the oil/water separator or to the 16,000-gallon wastewater discharge tank. This is a potential for a slug discharge to occur if oily wastewater was pumped to the wastewater discharge tank instead of the oil/water separator. The management of this wastewater needs to be documented in a slug discharge control plan to ensure this potential is minimized. The Pretreatment Regulations at 40 C.F.R. § 403.8(f)(2)(vi)(A-D) require a slug discharge control plan to consist of the following elements: A. Description of discharge practices, including non-routine batch Discharges. B. Description of stored chemicals. C. Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under § 403.5(b) with procedures for follow-up written notification within five days.	<u>Pretreatment Requirement</u> 40 C.F.R. § 403.8(f)(2)(vi)(A-D) <u>Corrective Actions</u> Develop a slug discharge control plan to minimize the spills and potential slug discharges from the truck washing operation.

D. If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Al Garcia	U.S. EPA Region 8 1595 Wynkoop Street 8WD-CWW Denver, Colorado 80202 303-312-6382	07/25/2023
Reviewer Name	Address/Phone Number	Date
Stephanie Passarelli	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202 303-312-6803	07/28/2023
Supervisor Signature/Name	Address/Phone Number	Date
Michael Boeglin	U.S. EPA Region 8 1595 Wynkoop Street 8WD-CWW Denver, Colorado 80202 303-312-6250	08/04/2023