



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

Memphis Environmental Field Office
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Bartlett, TN 38133
Phone 901-371-3000 Statewide 1-888-891-8332 Fax 901-371-3170

CERTIFIED MAIL 91 7108 2133 3932 2020 8169
RETURN RECEIPT REQUESTED

December 14, 2016

John Rumsey
AAA Mobile Wash
3741 New Getwell Road
Memphis, TN 38118

Re: Compliance Evaluation Inspection
 AAA Mobile Wash
 State Operation Permit (SOP) # SOP-06013

Dear Mr. Rumsey,

On December 12, 2016, Mrs. Maylynn Wilbert from the Division of Water Resources, Memphis Environmental Field Office met with you at the AAA Mobile Wash site located at 3741 New Getwell Road in Memphis, Tennessee to review facility records and discuss the facility's self-monitoring program. Your assistance and time was greatly appreciated during the inspection.

Attached you will find a copy of the Compliance Evaluation Inspection (CEI) report and associated photo document, which summarizes the findings of the inspection. At this time, AAA Mobile Wash does not appear to be in compliance with the terms and conditions of SOP-06013. The following issues noted below require attention:

1. At the time of the inspection, you indicated that treated wastewater recovered from washing operations underwent further treatment through a high-efficiency, above-ground coalescing system at the facility, but the treated wastewater was not disposed of at Excel TSD of Tennessee, LLC as the permit indicates/authorizes. It was discovered that you discharged and continue to discharge treated wastewater at the facility located at 3741 New Getwell Road into a drain/sink that is adjacent to the treatment system which discharges to the Publicly Owned Treatment Works (POTW). According to SOP-06013, AAA Mobile Wash must obtain approval for the wash water disposal from the municipality or utility and must comply with all their requirements including pretreatment regulations. You indicated that you were not aware of this requirement.
2. The magnetic sign used on the truck needs to be modified to include facility name (AAA Mobile Wash), owner name (John Rumsey), and phone number (901-230-0992) as required by SOP-06013.

Required Action:

- **On or before January 13, 2017** submit a written response addressing the issues mentioned above.

Your prompt attention and cooperation in this matter is appreciated. Compliance with the terms and conditions of the permit helps ensure that the state's waters are being protected from harmful pollutants which could cause or contribute to the stream's impairment. If you have any questions or comments with regard to the inspection or the CEI report, please contact me via email at maylynne.wilbert@tn.gov or by phone at 901-371-3024.

Sincerely,

Maylynne Wilbert

Maylynne Wilbert
Program Coordinator
Division of Water Resources
Memphis Field Office

Enclosure: Compliance Inspection Report and photo document

cc: TDEC/DWR/MEFO - file

ec: TDEC/DWR/NCO, Enforcement and Compliance Section

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Water Resources

Memphis Environmental Field Office, 8383 Wolf Lake Drive, Bartlett, TN 38133

1-888-891-8332 (TDEC)

Compliance Inspection for State Operating Permits

Facility Name: AAA Mobile Wash	Tracking Number: SOP-06013
Permit Effective Date: 1/01/2014	Permit Expiration Date: 12/31/2018
Date and Time of Inspection: 12/12/2016 10:00am	Inspector Name: Maylynne Wilbert

Official Contact Person Name: John Rumsey (Manager)	
Address: 3741 New Getwell Road Memphis, Tennessee 38118	Phone Number: 901-230-0992 Email: johnrumsey@ymail.com

Summary of Findings and Comments

On December 12, 2016, Mrs. Maylynne Wilbert with the Tennessee Department of Environment and Conservation, Division of Water Resources, Memphis Environmental Field Office (TDEC/DWR/MEFO), met with Mr. John Rumsey (Manager) at the AAA Mobile Wash site located at 3471 New Getwell Road in Memphis, Tennessee to review facility records and discuss the facility's self-monitoring program. The following is a summary of Mrs. Wilbert's findings and observations during and after the inspection.

I. Permit

State Operation Permit (SOP) for AAA Mobile Wash with tracking number SOP-06013 expires on December 31, 2018. The permit authorizes a mobile truck/vehicle wash operation with collection and recycle of wastewater for final treatment and disposal to Excel TSD of Tennessee, LLC located at 552 Rivergate Drive in Memphis, Tennessee. The operation should be such there is no discharge of wastewater to any surface or subsurface stream, watercourse, or drainage ditch because of an overflow, spills, and/or because of the occurrence of any other condition, that singly or in combination with any of the aforementioned conditions, causes such discharge to any surface or subsurface stream, watercourse, or drainage ditch. In addition, such system must be operated in a manner preventing the creation of a public health hazard.

II. Records/Reports

At the time of the inspection, Mr. Rumsey provided the following documents for review:

- Draft SOP-06013 permit. Mrs. Wilbert electronically sent Mr. Rumsey a copy of the final permit on 12/12/2016 for his records;
- Wash water recovery logs for 2014 and 2015 (no records for 2016);
- Material Safety Data Sheets (MSDS) for the cleaning agents used in his washing operations;

III. Facility Site Review

AAA Mobile Wash operates a mobile truck/vehicle washing operation (photo 1). According to Mr. Rumsey, business has been slow, and at this time only has a contract with a car lot company to spray down new vehicles prior to the vehicles being sold. He indicated that he only uses water to spray down the new vehicles and minimal water is used which is not enough to reclaim; thus no records of water recovered from washing operations during 2016 was available. However, please note that even though no soaps/detergents is used during the spraying of these vehicles, should there be significant water produced, there should still be no discharge of wastewater to any surface or subsurface stream, watercourse, drainage ditch, etc. as required by SOP-06013.

No washing operations were observed at the time of the inspection. Mr. Rumsey indicated that when washing activities takes place, wastewater is captured by a vacuum containment system. The wastewater is then sucked through a treatment/recycle system and then reused for other washing activities. Any treated/recycled water that is not used is brought to the facility located at 3741 New Getwell Road which undergoes further treatment through a high-efficiency, above-ground coalescing system (photo 2). Mr. Rumsey indicated that the treated wastewater is then disposed into a drain/sink adjacent to the treatment system which discharges to the Publicly Owned Treatment Works (POTW) (photo 3). He indicated that he has been discharging in this manner and not to Excel TSD of Tennessee, LLC as the permit indicates/authorizes. According to SOP-06013, AAA Mobile Wash must obtain approval for the wash water disposal from the municipality or utility and must comply with all their requirements including pretreatment regulations. Mr. Rumsey indicated that he was not aware of this requirement.

According to the NPDES permit, AAA Mobile Wash must place and maintain a sign attached (magnetically or otherwise) to the truck or trailer housing the wash equipment during hours of operation. The sign must include the facility name, "No Discharge Allowed" information, tracking number, owner name, and phone number. At the time of the inspection, a magnetic sign was observed on the truck (photos 1 and 4). However, the sign needs to include the facility name, owner name, and phone number as required by SOP-06013.

IV. Self-Compliance Program

At this time, it appears that AAA Mobile Wash currently does not have a reliable self-monitoring program and is not in compliance with SOP requirements (refer to Section III above with regard to improper wastewater disposal).

V. Operations and Maintenance

At this time, it appears that AAA Mobile Wash is properly operating and maintaining the mobile truck/vehicle washing operation to ensure no discharges of wastewater enters storm drains, wet-weather conveyances, streams, etc. The facility also appears to be maintaining its treatment system onsite. However, AAA Mobile Wash is not in compliance with the disposal of its wastewater generated/reclaimed during washing operations.

Photographic Log



Facility Name: AAA Mobile Wash		Site Location: 3741 New Getwell Road, Memphis, TN 38118	Tracking No.: SOP-06013
Photo No. 1	Date 12-12-2016		
Description			
<p>AAA Mobile Wash operates a mobile truck/vehicle washing operation. Mr. Rumsey indicated that when washing activities takes place, wastewater is captured by a vacuum containment system. The wastewater is then sucked through a treatment/recycle system and then reused for other washing activities.</p>			

Photo No. 2	Date 12-12-2016		
Description			
<p>View of the high-efficiency, above-ground coalescing treatment system onsite located at 3741 New Getwell Road.</p>			

Photographic Log



Facility Name: AAA Mobile Wash		Site Location: 3741 New Getwell Road, Memphis, TN 38118	Tracking No.: SOP-06013
Photo No. 3	Date 12-12-2016		
Description Mr. Rumsey indicated that the treated wastewater is then disposed into a drain/sink adjacent to the treatment system which discharges to the POTW.			

Photo No. 4	Date 12-12-2016		
Description At the time of the inspection, a sign was observed on the truck (photos 1 and 4). However, the sign needs to include the Permittee name, owner name, and phone number as required by the SOP.			