STATE OF TENNESSEE

OPERATING PERMIT

No. SOP-10009

Issued By

State of Tennessee
Department of Environment and Conservation
Division of Water Pollution Control
401 Church Street
L & C Annex, 6th Floor
Nashville, TN 37243-1534

In accordance with the provisions of Tennessee Code Annotated Section 69-3-108 and regulations promulgated pursuant thereto, permission is hereby granted to:

A.J.'s Mobile Wash, Inc.

for the operation of:	**a mobile vehicle wash water collection and holding tank system for storage and pump and haul of wastewater from washing operations to a permitted sewer system**
from facility located at:	**Memphis, Shelby County, Tennessee**
adjacent to waters named:	**No discharge allowed.**

This permit shall become effective on:	January 01, 2011
This permit shall expire on:	December 01, 2015
Issuance date:	December 01, 2010

Wade R. Murphy / for
Paul E. Davis, Director
Division of Water Pollution Control

CN-0729

RDAs 2352 AND 2366

A.J.'s Mobile Wash, Inc., at 3075 Fleetbrook Drive, in Memphis, Shelby County, Tennessee is hereby authorized to operate a mobile vehicle wash water collection system for transport to an onsite holding tank for storage and pumping and hauling of wash water as needed to a pubic sewer system or other waste treatment system permitted by the state. This authorization is in accordance with the application filed and received on January 22, 2010, in the Nashville Central Office of the Tennessee Division of Water Pollution Control. This authorization is consistent with approved plans, specifications and other data submitted to the Department in support of the above application, all of which are filed with and considered as a part of this permit, together with the following named conditions and requirements.

This permit allows the operation of mobile vehicle wash wastewater collection and storage system for wastewater disposal. The operation should be such that 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, said system must be operated in a manner preventing the creation of a public health hazard.

PART I

A. PERMIT CONDITIONS AND REQUIREMENTS

Mobile Washing

1. The system must be operated and maintained in a fashion, which will insure that the system does not cause any violations of the conditions or requirements of this permit.

2. No vehicle washing will take place during rain events. A rain event is defined below.

3. The wash system shall not produce any runoff.

4. This permit does not allow the wash out of the inside of truck trailers or other heavy construction equipment.

5. A.J.'s Mobile Wash, Inc. must contact the Tennessee Division of Water Pollution Control, Environmental Field Office (list enclosed) responsible for the county in which A.J.'s Mobile Wash, Inc. is planning to operate 24 hours prior to initially setting up its equipment and commencing to wash vehicles/vehicles, trailers, or other equipment. The nearest field office should be provided with a telephone and/or pager number through

which the system operator can be contacted at all times. It is the responsibility of A.J.'s Mobile Wash, Inc. to maintain all contact information.

6. The permittee shall not set up to wash any vehicle on state or public lands. The permittee shall not set up to wash any vehicle in areas not zoned for commercial business. The permittee shall not set up to wash any vehicle in any area where commercial or industrial business is not permitted, nor in any area where this type of activity is prohibited by any law or ordinance.

7. This permit does not relieve the permittee from any requirements of the municipality or utility where the waste wash water is ultimately disposed. The permittee must obtain approval for the wash water disposal from that municipality or utility and must comply with all their requirements including pretreatment regulations.

8. The permittee must keep a log of the date, individual or facility name and address of each wash location, the amount of wastewater collected and where it was disposed. The log shall contain a list of the types of cleaning agents used and the amount of sludge produced and how it was disposed. Also, any operation problems encountered during the day must be noted in the log.

9. The permittee must keep records of the Publicly Owned Treatment Works (POTW) or state permitted treatment facility that receives the wastewater discharge. The permittee must obtain an Industrial User permit from the POTW pretreatment program, if required.

10. All reports and records required by this permit must be kept by A.J.'s Mobile Wash, Inc. for a minimum of three (3) years and made available for review if requested by the Division of Water Pollution Control. A copy of these records must be sent to the Water Pollution Control Environmental Field Office within fifteen days of a request.

11. The discharge or disposal of wastewater or wastes by any way or method other than the treatment and/or recycle, containment, and transport to lawful treatment or disposal services, or the occurrence of any of the aforementioned conditions, constitutes a violation of this permit.

12. This permit is subject, at any time, to review by the Tennessee Department of Environment and Conservation, Division of Water Pollution Control.

13. Noncompliance with the no discharge provision of this permit due to excessive rainfall, equipment failure, etc., must be reported within 24 hours to the nearest Water Pollution Control Environmental Field Office by telephone. A written submission must be provided within five days. These reports shall be filed with the appropriate Environmental Field Office, using the county list provided below:

Field Office- Jackson
1625 Hollywood Drive
Jackson, TN 38305 -2222
(731) 512-1300
Benton, Carroll, Chester, Crockett, Decatur, De Kalb, Dyer, Gibson, Hardeman, Hardin, Haywood, Henderson, Henry, Lake, Lauderdale, Madison, McNairy, Obion, Weakley

---

Field Office- Memphis
8383 Wolf Lake Drive
Bartlett, TN 38133-4119
(901) 371-3000
Fayette, Shelby, Tipton

---

14. Failure to meet one or more of the permit conditions and criteria shall constitute a violation of this permit.

15. Notwithstanding this permit, permittee shall remain liable for any damages sustained by the State of Tennessee, including but not limited to fish kills and losses of aquatic life and/or wildlife, as a result of the discharge or spill of waste water to any surface or subsurface waters. Additionally, it shall be the responsibility of the permittee to conduct its wastewater treatment and/or disposal activities in a manner such that public or private health hazards or nuisances will not be created.

Onsite Holding Tank

16. The freeboard in the onsite holding tank located must be measured and recorded every seven days. A copy of these measurements shall be submitted to the Environmental Field Office - Memphis within fifteen days of a request.

17. Any sludge or other materials removed from the storage tank must receive disposal adequate to prevent their entrance into or pollution of any surface or subsurface waters. Additionally, the disposal of such sludge or other material must be in compliance with the Tennessee Solid Waste Disposal Act, TCA 68-31-101 et seq. and the Tennessee Hazardous Waste Act, TCA 68-46-101 et seq.

18. The permittee shall implement site management practices to prevent stormwater from entering the onsite holding tank.

Pump and Haul from Onsite Storage Tank

19. The permittee must keep a log of the following:

i. date of pump and haul
ii. facility name where wastewater is disposed/hauled

iii. facility address where wastewater is disposed/hauled
iv. amount of wastewater hauled
v. amount of sludge generated
vi. how sludge is disposed
vii. any operational problems encountered during pump and haul must be noted in the log.

20. When pump and haul system is used the following conditions shall be followed:

21. The wastewater must be disposed of at a POTW or other facility having a sewerage system permit issued by the State of Tennessee. The transport and ultimate disposal of the wastewater must be documented by a manifest system on forms acceptable to the Environmental Field Office. The permittee shall also record on the manifest forms, the number of loads hauled, the volume of each load, the dates of hauling, and the names of people present. A copy of the manifest must be submitted to the Environmental Field Office on a monthly basis. If there is no wastewater disposed of during any given month, this shall be documented and submitted to the Environmental Assistance Center as well.

22. The permittee must provide for wastewater to be pumped from the collection and retention system on a regular schedule sufficient to ensure that a reasonable margin of safety is provided against the possibility of an overflow.

23. Records of when pumping takes place must be kept at the facility for review by the Division of Water Pollution Control. Monthly operation reports will be submitted to the Environmental Field Office by the 15th day of the month following data collection.

24. A representative of the facility shall be present at all times when waste is being transferred to the haul truck to insure that waste spills do not occur. The residuals should be treated or remediated in a manner approved by the Environmental Field Office

25. The permittee or his waste hauling contractor must clean up any spillage of wastewater that results from the operation of this pump and haul system.

B. ADDITION OF WASTE LOADS

1. The permittee shall not add waste loads from other sources without approval by the division.

PART II

A. DEFINITIONS

1. A "dry weather overflow" is not permitted. There shall be no discharge from any wash activities under this permit.

2. A "rainfall event" is defined as any occurrence of rain, preceded by 10 hours without precipitation that results in an accumulation of 0.01 inches or more. Instances of rainfall occurring within 10 hours of each other will be considered a single rainfall event. No washing activities shall be performed during a rainfall event that cannot be contained in its entirety and disposed of properly.

3. A "storm (sewer) overflow event" is defined as an unpermitted discharge of wastewater from the collection or treatment system to any municipality's storm sewer sytem. These are not allowed or permitted under any circumstances.

4. A "collection system" for the purposes of this permit' includes bladder systems, receiving tanks, pump tanks, and vacuum lines.

5. "Overflow", means the discharge of wastes from any portion of the collection system. Overflows are prohibited. The permittee shall operate the collection system so as to avoid overflows.

B. GENERAL PROVISIONS

1. Duty to Reapply

The permittee is not authorized to operate after the expiration date of this permit. In order to receive authorization to operate beyond the expiration date, the permittee shall submit such information and forms as are required to the director no later than 180 days prior to the expiration date.

2. Right of Entry

The permittee shall allow the Director of the Division of Water Pollution Control, or authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises ("premises" is defined here as the vehicle and trailered portions of the mobile wash business) where an effluent source is located or where records are required to be kept under the terms and conditions of this permit, and at reasonable times to copy these records; to review the record/log books of the permittee; and

b. To inspect at reasonable times any collection, transport, treatment, and pollution management equipment; and

c. To collect samples at reasonable times of any discharge of waste wash water pollutants.

3. Availability of Reports

All reports and log books submitted in accordance with the terms of this permit shall be available for public inspection at the offices of the Division of Water Pollution Control. All reports and data shall be kept for minimum of three years by the permittee.

4. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems (and related appurtenances) for collection and treatment which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. This provision requires the operation of backup or auxiliary facilities or similar systems, which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

5. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property

or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

Upon agreement with a property owner to perform washing activities and before the permittee sets up to operate at a facility (e.g. private location, truck stop, truck service area, garage or maintenance facility), the contractor may provide the property owner where washing takes place a complete copy of this permit.

This permit does not relieve the property owner of potential liability as a result of actions performed by the permittee/contractor that may impact the environment.

6. Severability

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, then the application of such provision to other circumstances and to the remainder of this permit shall not be affected thereby.

7. Other Information

If the permittee becomes aware that he failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the director, then he shall promptly submit such facts or information.

C. CHANGES AFFECTING THE PERMIT

1. Permit Modification, Revocation, or Termination

a. This permit may be modified, revoked and reissued, or terminated for cause as described in Tennessee Code Annotated 69-3-108(f).

b. The permittee shall furnish to the director or his representative, within a reasonable time, any information which may be requested to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit. The permittee shall also furnish to the director, upon request, copies of records required to be kept by this permit.

2. Change of Ownership

This permit may be transferred to another person by the permittee if:

a. The permittee notifies the director in writing of the proposed transfer at least 30 days in advance of the proposed transfer date;

b. The notice includes a written agreement between the existing and the new permittees containing a specified date for transfer of permit responsibility, coverage, and liability between them; and

c. The director, within 30 days, does not notify the current permittee and the new permittee of his intent to modify, revoke and reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

3. Change of Mailing Address

The permittee shall promptly provide to the director written notice of any change of mailing address, or contact information. In the absence of such notice the original address and telephone number(s) of the permittee will be assumed to be correct.

D. NONCOMPLIANCE

1. Effect of Noncompliance

Any permit noncompliance constitutes a violation of applicable State and Federal laws and is grounds for enforcement action, permit termination, permit modification, or denial of permit reissuance.

2. Reporting of Noncompliance

a. 24-Hour Reporting

In the case of any noncompliance, which would cause a threat to public drinking supplies, or any other discharge, which could constitute a threat to human health or the environment, the required notice of noncompliance shall be provided to the appropriate Division Field Office within 24 hours from the time the permittee becomes aware of the circumstances. (The Field Office should be contacted for names and phone numbers of emergency response personnel.)

A written submission must be provided within five days of the time the permittee becomes aware of the circumstances unless this requirement is waived by the director on a case-by-case basis. The permittee shall provide the director with the following information:

i. A description of the discharge and cause of noncompliance;

ii. The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and

iii. The steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

This written notice shall not be considered as excusing or justifying the failure to comply with this permit.

b. Scheduled Reporting

For instances of noncompliance which are not reported under subparagraph 2. a. above, the permittee shall report the noncompliance on an annual basis. The report shall contain all information concerning the steps taken, or planned, to reduce, eliminate, and prevent recurrence of the violation and the anticipated time the violation is expected to continue.

4. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the waters of Tennessee resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

D. LIABILITIES

1. Civil and Criminal Liability

The permittee is subject to civil and Criminal liability for violation of this permit. Notwithstanding this permit, the permittee shall remain liable for any damages sustained by the State of Tennessee, including but not limited to fish kills and losses of aquatic life and/or wildlife, as a result of the discharge of wastewater to any surface or subsurface waters. Additionally, notwithstanding this Permit, it shall be the responsibility of the permittee to conduct its wastewater treatment and/or discharge activities in a manner such that public or private nuisances or health hazards will not be created.

2. Liability Under State Law

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law.

E. PROHIBITIVE DISCHARGE STANDARDS

1. Under no circumstances shall the permittee allow introduction of the following wastes into a waste treatment system:

a. Pollutants which create a fire or explosion hazard in the POTW.

b. Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0 unless the works is specifically designed to accommodate such discharges.

c. Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in interference.

d. Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW.

e. Any priority pollutant in amounts that will contaminate the treatment works sludge.

f. Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through.

g. Pollutants which results in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems.

h. Any trucked or hauled pollutants except at discharge points designated by the POTW.

F. REQUIRED INFORMATIONAL SIGNS

The permittee shall place and maintain signs on each vehicle and trailer associated with the mobile wash system. For the purposes of this requirement, there shall be two signs per vehicle, clearly visible to the public during the mobile wash operations. The minimum sign size should be two feet by two feet (2' x 2') with one-inch (1") letters. The sign should be made of durable material, that may be attached magnetically or by other suitable means, and have a white background with black letters.

Permitted Mobile Wash Collection System with
NO Discharge Allowed
State Operating Permit – SOP-10009
A.J.'s Mobile Wash, Inc.
(901) 348-0742

No later than thirty-(30)-days from permit issuance, the permittee shall have the above sign(s) on display on each vehicle and trailer associated with the mobile wash system.

PART III

A.J.'s Mobile Wash, Inc.
STATE OPERATION PERMIT NO. SOP-10009
Memphis, Shelby County, Tennessee

Permit Writer: Wade D. Murphy

FACILITY CONTACT INFORMATION:
Mr. Jason Cushing, Owner
Memphis, Shelby County, Tennessee
Phone Number: (901) 348-0742

Facility location:	Various locations within the City of Memphis, Tennessee.
Name of the nearest stream:	**No discharge allowed.**
Treatment system:	Collection and transport of wash water to onsite storage for pump and haul to permitted sewerage systems as needed.
Reporting:	Record (Log Book) keeping only, unless otherwise stated in the permit above.
Permit period:	This permit will be issued for a five-year period effective from the issuance date on the title page.