



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1PZ0001920080604

CLINTON

PILOT TRAVEL CENTERS LLC NO 016

WARE, RONALD

2008/06/04



State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 4, 2008

Pilot Travel Centers, LLC
Attn: Chip Hughes
5508 Lonas Drive
Knoxville, Tennessee 37919

**Re: Pilot Travel Center # 16, 5722 U.S. Rte. 68 North, Clinton County, Ohio
Reconnaissance Inspection**

Dear Mr. Hughes:

On Tuesday, May 27, 2008, Mr. Ron Ware of this office conducted a Reconnaissance Inspection of the wastewater treatment plant that serves the above referenced facility in Liberty Township, Clinton County (NPDES Permit No. 1PZ00019*DD, OH0096466). Gary Wagner, the contract operator for this facility, was present during the inspection. The purpose of this inspection was to evaluate plant operation and performance. A copy of the inspection report is enclosed.

This wastewater treatment plant has had 32 violations of the final effluent limitations in its NPDES permit (mostly for total chlorine residual) over the past year (see attached list). Mr. Wagner indicated during my inspection that this treatment plant has the following problems:

The timers for the air blowers for the aeration tanks are faulty. The timers need to be replaced or repaired. In the interim, the air blowers are being operated constantly. Having the air blowers run constantly is not an optimal way of operating the aeration tanks. Having the air blowers run only at certain time intervals has been shown to be a way to efficiently operate the aeration tanks at lower power costs.

The fixed media clarifiers (the units ahead of the sand filter dosing tank) were full of biological treatment solids and the media were either displaced or broken. There were more biological treatment solids in the fixed media clarifiers than in the aeration tanks (where the solids need to be for wastewater treatment to occur). These biological treatment solids need to be removed from the fixed media clarifiers, and the media needs to be either fixed or replaced.

The dosing tank for the sand filters shares a common wall with the effluent disinfection tank. Mr. Wagner pointed out that someone had installed a "bypass" pipe in

this common wall between the two tanks. This "bypass" pipe allows for the possibility of the treated wastewater bypassing the sand filters (which are in place to ensure that the treatment plant can meet its final effluent limitations for Total Suspended Solids).

Mr. Wagner also pointed out that he had installed a de-chlorination unit in the effluent disinfection tank. This de-chlorination unit was supposed to have been installed twenty two months ago (on July 1, 2006), as required by a compliance schedule in this treatment plant's current NPDES permit (1PZ00019*DD). Most of the aforementioned final effluent violations for total chlorine residual are attributable to not having a de-chlorination unit in place.

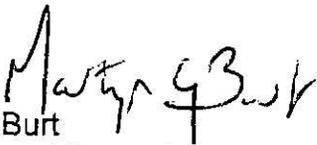
Please provide this office with a written description of any actions, either taken or proposed, that will be taken to correct and/or address these problems. This written description should include the dates, either actual or proposed, for completion of these actions. Please provide this office with this written response within thirty days of receipt of this letter.

During the inspection Mr. Wagner mentioned the possibility of this Pilot Travel Center facility being connected to a nearby sanitary sewer system. Please be advised that the sanitary sewer system in question is owned by a private entity (R.L.R. Investments, LLC), and that neighboring entities which are connected to this nearby sanitary sewer system are located on lots which are owned by and leased from R.L.R. Investments. Negotiations are currently underway between R.L.R. Investments and Clinton County for transferring ownership and maintenance responsibilities for the wastewater treatment plant (and its associated sanitary sewer system) from R.L.R. Investments to Clinton County. However, this negotiated transfer may not be finalized for another year or longer. Hence, an anticipated connection of Pilot Travel Center # 16 to this nearby sanitary sewer system is not a sufficient reason for postponing repairs to the wastewater treatment plant that serves Pilot Travel Center # 16.

There is also the issue of the oil/water separator for Pilot Travel Center # 16. Please also provide this office with information about the maintenance schedule for this oil/water separator, and where the discharge from the outlet for this oil/water separator is directed.

If you have any questions regarding this report, please contact Mr. Ware at (937) 285 - 6098.

Sincerely,


Martyn G. Burt
Environmental Supervisor
Division of Surface Water

cc: Gary Wagner, Wagner Technical Service
Clinton County Health Department

OHIO ENVIRONMENTAL PROTECTION AGENCY SWDO
SEMI-PUBLIC SEWAGE DISPOSAL INSPECTION FORM

NPDES No. 1PZ00019*DD Appl. No. OH0096466 Expiration Date 4/30/2009

INSPECTOR Ron Ware DATE 5/27/2008 Time 9:00 A.M.

FACILITY NAME Pilot Travel Center # 16
 ADDRESS 5722 U. S. Route 68 North
 COUNTY Clinton
 FLOW DESIGN 5,500 gpd
 OPERATING FLOW 3,088 gpd
 PLANT OPERATING YES x NO

OWNER NAME Pilot Travel Centers, LLC
 ADDRESS 5508 Lonas Drive
Knoxville, TN 37919
 PHONE NO. Chip Hughes (865) 206 - 5269
 OPERATOR Gary Wagner
(937) 533 - 0082

PRETREATMENT

Comminutor Bar Screen Trash Trap x Grease Trap None Other Comments: Trash trap reportedly pumped once a month
 Does Trash Trap need pumped? Yes No Unknown x
 Maintenance of pretreatment components is Excellent Good x Fair Poor

SECONDARY TREATMENT

AERATION

COLOR OF SLUDGE: Black Gray Light Brown Dark Brown Other x (little to no sludge present)
 QUALITY OF SLUDGE: Heavy Medium Thin x Foamy Odorous (Strong Slight)
 YES NO YES NO Comments: Timers for blowers are faulty; blowers are being operated constantly until the timers are fixed
x Aeration is taking place x Plant is septic
x Are blowers operating x Plant is on timer
x Skimmers are operating x Is there excess foam
x Are diffusers operating x Is the plant flooded
x Is sludge return operating x Grating is present Condition:
 Maintenance of aeration components is Excellent Good x Fair Poor

SETTLING

CLARITY: Clear x Cloudy Solids Present Comments:
 CONDITION OF WEIR: Clean x Excessive Algae/Solids Build-up Level x
 EFFLUENT IN WEIR: Clear x Light Solids Heavy Solids Other
 DOES CHAMBER NEED SCRAPED: Yes No x Unknown
 Maintenance of settling components is Excellent Good x Fair Poor

TERTIARY TREATMENT

FILTERS

YES	NO		YES	NO		Comments: <u>The fixed media clarifiers ahead of the sand filters were full of sludge that had dislodged the media. These units need to be cleaned and the media re-built</u>
<u>x</u>	<u> </u>	Sand filters (Slow Rapid)	<u>x</u>	<u> </u>	Subsurface Upflow	
<u>x</u>	<u> </u>	Distribution box operating	<u>x</u>	<u> </u>	Beds alternated	
<u>x</u>	<u> </u>	Are filters ponding/flooding	<u> </u>	<u>x</u>	Beds being raked	
<u> </u>	<u>x</u>	Sand filters overgrown	<u>x</u>	<u> </u>	Chlorination present	Type: <u>Tablet</u>
<u> </u>	<u>x</u>	UV present	<u>x</u>	<u> </u>	Dechlor present	Type: <u>Tablet</u>

Maintenance of settling components is Excellent Good Fair Poor x

SLUDGE HANDLING/STORAGE/DISPOSAL

Hauler Name Neal's Septic Service YES NO Comments:
 Disposal Site Wilmington WWTP YES NO x
 Solids wasted from Clarifier YES x NO Sludge drying beds
 How often solids wasted As needed YES NO Sludge holding tank
 Maintenance of sludge handling components is Excellent Good x Fair Poor

PLANT DISCHARGE

DISCHARGE POINT

Pond Stream Storm Sewer Leach trench Ditch Ravine Catch Basin x Unknown Other
 Name of receiving point Unnamed tributary of Anderson Fork
 Is discharge visible: Yes x No
 Quality of Effluent: Clear Cloudy Gray Black Other Effect on receiving point

PLANT MAY NOT BE OPERATING PROPERLY DUE TO: Hydraulic overload Organic overload Solids overload Hydraulic underload
 Organic underload Inadequate Maintenance x Equipment failure x Inexperienced operator Insufficient wasting
 Comment:

Get New Data

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
1PZ00019*DD	May 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.2	5/3/2007
1PZ00019*DD	May 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.3	5/10/2007
1PZ00019*DD	May 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.3	5/16/2007
1PZ00019*DD	May 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.3	5/23/2007
1PZ00019*DD	June 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.21	6/1/2007
1PZ00019*DD	June 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.51	6/8/2007
1PZ00019*DD	June 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.36	6/15/2007
1PZ00019*DD	June 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.32	6/22/2007
1PZ00019*DD	June 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.2	6/27/2007
1PZ00019*DD	July 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.22	7/5/2007
1PZ00019*DD	July 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.24	7/12/2007
1PZ00019*DD	July 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.81	7/19/2007
1PZ00019*DD	July 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.63	7/25/2007
1PZ00019*DD	August 2007	001	80082	CBOD 5 day	30D Conc	10	12.0	8/1/2007
1PZ00019*DD	August 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.71	8/2/2007
1PZ00019*DD	August 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.63	8/9/2007
1PZ00019*DD	August 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.62	8/17/2007
1PZ00019*DD	August 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.43	8/22/2007
1PZ00019*DD	August 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.51	8/29/2007
1PZ00019*DD	September 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.23	9/6/2007
1PZ00019*DD	September 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.48	9/12/2007
1PZ00019*DD	September 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.49	9/20/2007
1PZ00019*DD	September 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.37	9/27/2007
1PZ00019*DD	October 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.44	10/3/2007
1PZ00019*DD	October 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.37	10/11/2007
1PZ00019*DD	October 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.57	10/18/2007
1PZ00019*DD	October 2007	001	50060	Chlorine, Total Residual	1D Conc	0.038	0.36	10/24/2007
1PZ00019*DD	December 2007	001	80082	CBOD 5 day	30D Qty	0.21	0.29432	12/1/2007
1PZ00019*DD	February 2008	001	00530	Total Suspended Solids	30D Conc	12	13.0	2/1/2008
1PZ00019*DD	February 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	5.0	9.4	2/1/2008
1PZ00019*DD	February 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.10	0.10247	2/1/2008
1PZ00019*DD	February 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	7.5	9.4	2/15/2008