



**Environmental  
Protection Agency**

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



\*1PZ0001920110224\*

CLINTON

PILOT TRAVEL CENTERS LLC NO 016

WARE, RONALD

2011/02/24



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

February 24, 2011

Keith Carlton, Environmental Project Manager  
Pilot Travel Centers LLC  
5508 Lonas Road  
Knoxville, TN 37909

RE: Pilot Travel Center #16 - Reconnaissance Inspections

Dear Mr. Carlton:

On January 18, 2011 and February 14, 2011, I conducted Reconnaissance Inspections at the Pilot Travel Center # 16 in Liberty Township, Clinton County, Ohio. The purpose of these inspections was to evaluate compliance with the Consent Order that Pilot Oil Corporation and Pilot Travel Centers, LLC signed on February 23, 2010 (copy enclosed). A summary of my inspection findings is enclosed.

The main finding of my inspections is the determination that the Oil Water Separator (O/S) serving the Pilot Travel Center # 16 facility does not discharge to the Environmental Control Pond (ECP) at the site. I also noted during my inspection on February 14, 2011 that there was a noticeable flow of water in a catch basin located in the middle of the drive thru lane for the neighboring Wendy's restaurant. This flow of water was entering this catch basin from an inlet pipe coming from the direction of the Pilot Travel Center # 16 facility during a "flushing test" of the trench drains around the diesel fuel dispensing island. This water flow persisted after the flushing water to the trench drains was shut off. Please note that if this flow of water was coming from the O/S for the Pilot Travel Center # 16 facility, the aforementioned catch basin on the Wendy's property is not listed as a permitted outfall in the current NPDES permit for the Pilot Travel Center # 16 facility (1PZ00019\*ED).

Please be advised that item # 28 on page 16 of the Consent Order states in part:

*"..Each of Defendant's remaining 23 Ohio sites shall be equipped with: 1) an O/S that receives all flow from all diesel dispensing areas; 2) an ECP that receives all flow from all O/Ss; and 3) Turn Down 90 Valves on each ECP that receives flow from any diesel dispensing area. Defendant shall properly operate and maintain all O/Ss, ECPs and Turn Down 90 Valves located on each of Defendant's remaining 23 Ohio sites."*

Per item # 27 on page 15 of the Consent Order, a PTI application needs to be submitted in accordance with OAC 3745 - 42 to the Director for authorization to install any of three structures (i.e., an O/S, an ECP that receives all flow from all O/Ss, and a Turn Down 90 Valve) that are lacking at each of the Defendant's remaining 23 Ohio sites. There was a deadline of 180 days from the effective date of the Consent Order to submit said PTI application(s). Since the Consent Order that was signed on February 23, 2010, the "PTI" deadline was August 23, 2010.

In summation, since it has been determined that the ECP at the Pilot Travel Center # 16 facility does not receive any flow from the O/S at the site, a PTI application and detail plans needs to be submitted to the Ohio EPA Southwest District Office as soon as possible. The PTI application and detail plans need to show the modifications that are needed to direct all flow from the O/S to the ECP at the Pilot Travel Center # 16 facility.

Also, a review of the monthly operating reports for the wastewater treatment plant that serves the Pilot Travel Center # 16 facility has shown that the following effluent limitation violations have occurred over the past three months (November 2010, December 2010, and January 2011):

Reporting Period	Parameter	Limit Type	Limit	Reported Value
Nov. 2010	Nitrogen, Ammonia (NH <sub>3</sub> )	30 day avg. concentration	5.0 mg/l	8.4 mg/l
Nov. 2010	Nitrogen, Ammonia (NH <sub>3</sub> )	30 day loading	0.10 kg/day	0.13 kg/day
Nov. 2010	Nitrogen, Ammonia (NH <sub>3</sub> )	7 day avg. concentration	7.5 mg/l	8.4 mg/l
Dec. 2010	CBOD <sub>5</sub>	30 day avg. concentration	10 mg/l	14.62 mg/l
Dec. 2010	Nitrogen, Ammonia (NH <sub>3</sub> )	30 day avg. concentration	5.0 mg/l	117. mg/l
Dec. 2010	Nitrogen, Ammonia (NH <sub>3</sub> )	30 day loading	0.10 kg/day	1.77 kg/day
Dec. 2010	Nitrogen, Ammonia (NH <sub>3</sub> )	7 day avg. concentration	7.5 mg/l	117. mg/l
Dec. 2010	Nitrogen, Ammonia (NH <sub>3</sub> )	7 day loading	0.16 kg/day	1.77 kg/day
Dec. 2010	Total Suspended Solids	30 day avg. concentration	12 mg/l	13.33 mg/l
Jan. 2011	Nitrogen, Ammonia (NH <sub>3</sub> )	30 day avg. concentration	5.0 mg/l	28.9 mg/l
Jan. 2011	Nitrogen, Ammonia (NH <sub>3</sub> )	30 day loading	0.10 kg/day	0.66 kg/day
Jan. 2011	Nitrogen, Ammonia (NH <sub>3</sub> )	7 day avg. concentration	7.5 mg/l	28.9 mg/l
Jan. 2011	Nitrogen, Ammonia (NH <sub>3</sub> )	7 day loading	0.16 kg/day	0.66 kg/day
Jan. 2011	Total Suspended Solids	30 day avg. concentration	12 mg/l	17. mg/l
Jan. 2011	Total Suspended Solids	30 day loading	0.25 kg/day	0.39 kg/day
Jan. 2011	Total Suspended Solids	7 day loading	0.37 kg/day	0.39 kg/day

Pilot Travel Centers LLC

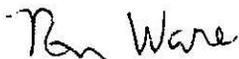
February 24, 2011

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Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Our office received Non-Compliance Notification Report forms for the violations in November 2010 and January 2011, but none for December 2010. The reported cause of these effluent limitation violations was a faulty relay that operates the air blowers for the aeration tanks. One of the Non-Compliance Notification Reports (copy enclosed) states that this faulty relay was found and repaired on January 11, 2011. No further response is needed at this time.

If you have any questions or comments concerning the contents of this letter or the enclosed inspection summary, you can reach me in this office at (937) 285-6098.

Sincerely,



Ron Ware  
Ohio EPA - Division of Surface Water  
Southwest District Office

cc: Joey Cupp, Pilot Travel Centers LLC  
Alan Fass, Dynamis, Inc.  
Clinton County Health District

RW/ca