



**Environmental
Protection Agency**

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



1PZ0001920110826

CLINTON

PILOT TRAVEL CENTERS LLC NO 016

WARE, RONALD

2011/08/26



**Environmental
Protection Agency**

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

August 26, 2011

Joey Cupp, Environmental Manager
Pilot Travel Centers LLC
5508 Lonas Road
Knoxville, TN 37909

RE: Pilot Travel Center #16 - Compliance Inspection on August 16, 2011

Dear Mr. Cupp:

On Tuesday, August 16, 2011, I conducted an inspection at Pilot Travel Center # 16 in Liberty Township, Clinton County, Ohio. The purpose of the inspection was to evaluate the modification work that had been completed on the discharge line from the Oil Water Separator (O/S) and on the Environmental Control Pond (ECP). I also inspected the wastewater treatment plant that serves the site. Danny Jones with Dynamis, Inc., and Tom Horn and Don Eagle with IFM, Inc. were present at the site during my inspection.

The main finding of my inspection is that the O/S serving the Pilot Travel Center # 16 facility does discharge to the ECP at the site. The site modification work that was recently completed (on August 4, 2011) appears to conform with the approved detail plans for PTI # 812738.

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 course of the first five months of this year:

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2011	Nitrogen, Ammonia (NH3)	30D Concentration	5.0	28.9	1/1/2011
January 2011	Nitrogen, Ammonia (NH3)	7D Concentration	7.5	28.9	1/22/2011
January 2011	Nitrogen, Ammonia (NH3)	30D Quantity	0.10	.65632	1/1/2011
January 2011	Nitrogen, Ammonia (NH3)	7D Quantity	0.16	.65632	1/22/2011
January 2011	Total Suspended Solids	30D Concentration	12	17.	1/1/2011
January 2011	Total Suspended Solids	30D Quantity	0.25	.38607	1/1/2011
January 2011	Total Suspended Solids	7D Quantity	0.37	.38607	1/22/2011
February 2011	Nitrogen, Ammonia (NH3)	30D Concentration	5.0	10.4	2/1/2011

February 2011	Nitrogen, Ammonia (NH3)	7D Concentration	7.5	10.4	2/22/2011
February 2011	Nitrogen, Ammonia (NH3)	30D Quantity	0.10	.47237	2/1/2011
February 2011	Nitrogen, Ammonia (NH3)	7D Quantity	0.16	.47237	2/22/2011
February 2011	Total Suspended Solids	30D Concentration	12	13.	2/1/2011
February 2011	Total Suspended Solids	30D Quantity	0.25	.59046	2/1/2011
February 2011	Total Suspended Solids	7D Quantity	0.37	.59046	2/22/2011
March 2011	Nitrogen, Ammonia (NH3)	30D Concentration	5.0	47.7	3/1/2011
March 2011	Nitrogen, Ammonia (NH3)	7D Concentration	7.5	47.7	3/22/2011
March 2011	Nitrogen, Ammonia (NH3)	30D Quantity	0.10	.36109	3/1/2011
March 2011	Nitrogen, Ammonia (NH3)	7D Quantity	0.16	.36109	3/22/2011
April 2011	CBOD 5 day	30D Concentration	10	10.5	4/1/2011
April 2011	CBOD 5 day	30D Quantity	0.21	.51327	4/1/2011
April 2011	CBOD 5 day	7D Quantity	0.31	.51327	4/22/2011
April 2011	Nitrogen, Ammonia (NH3)	30D Concentration	5.0	16.2	4/1/2011
April 2011	Nitrogen, Ammonia (NH3)	7D Concentration	7.5	16.2	4/22/2011
April 2011	Nitrogen, Ammonia (NH3)	30D Quantity	0.10	.79191	4/1/2011
April 2011	Nitrogen, Ammonia (NH3)	7D Quantity	0.16	.79191	4/22/2011
April 2011	Total Suspended Solids	30D Concentration	12	16.	4/1/2011
April 2011	Total Suspended Solids	30D Quantity	0.25	.78213	4/1/2011
April 2011	Total Suspended Solids	7D Quantity	0.37	.78213	4/22/2011
May 2011	CBOD 5 day	30D Quantity	0.21	.29773	5/1/2011
May 2011	Dissolved Oxygen	1D Concentration	5.0	2.8	5/24/2011
May 2011	Nitrogen, Ammonia (NH3)	30D Concentration	2.0	7.84	5/1/2011
May 2011	Nitrogen, Ammonia (NH3)	7D Concentration	3.5	7.84	5/22/2011
May 2011	Nitrogen, Ammonia (NH3)	30D Quantity	0.04	.26707	5/1/2011
May 2011	Nitrogen, Ammonia (NH3)	7D Quantity	0.07	.26707	5/22/2011
May 2011	Total Suspended Solids	30D Concentration	12	18.	5/1/2011
May 2011	Total Suspended Solids	30D Quantity	0.25	.61317	5/1/2011
May 2011	Total Suspended Solids	7D Quantity	0.37	.61317	5/22/2011

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.

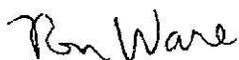
Our office received either Non-Compliance Notification Report forms or follow up letters from your treatment plant operations firm (IFM) for these violations. The reported cause of the violations in January 2011 was a faulty relay that operates the air blowers for the aeration tanks. The reported cause of the violations in the following months was unusually high flow rates.

Tom Horn with IFM stated during my inspection that a broken and buried clean out on a lateral to the treatment plant was discovered and repaired during the re-excavation work on the ECP. Finding this source of "excessive" water appears to have made a

difference in the performance of the treatment plant. Reported flows from the start of February 2011 thru the end of May 2011 averaged about 10,000 gpd while the reported flows from the start of June 2011 thru the end of July 2011 averaged about 6,400 gpd. No effluent violations were reported for both June 2011 and July 2011. No further response regarding the treatment plant 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: Alan J. Fass, Dynamis, Inc.
Thomas R. Horn, IFM, Inc.
Clinton County Health District

RW/ca



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PZ0001.9*ED	OH0096466	08/16/2011	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Pilot Travel Center # 16 5722 North U.S. Route 68 Clinton County, Liberty Township	9:30 AM	August 1, 2009
	Exit Time	Permit Expiration Date
	10:15 AM	July 31, 2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Thomas Horn, IFM, Inc.	(419) 439 - 5752	
Don Eagle, IFM, Inc., plant operator	(865) 660 - 0268	
Danny Jones, Dynamis, Inc.		
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Don Eagle, IFM, Inc.		
Name, Address and Title of Responsible Official	Phone Number	
Pilot Travel Centers, LLC Attn: Joey Cupp P.O. Box 10146 Knoxville, Tennessee 37939 - 0146	(865) 300-6150	

Ohio EPA Inspector	Ohio EPA Reviewer
<i>Ron Ware</i> 8/26/11 Ron Ware Division of Surface Water Southwest District Office	

Permit #: 1PZ00019*ED
 NPDES #: Error! Reference source not found.

Average Daily Design Flow:	5,500 Gallons/Day
Plant Serves:	Service station with sandwich shop
Average Daily Flow: (Period of Review):	8,234 Gallons/Day (June 2010 thru May 2011)
Method of flow monitoring:	Ultrasonic and weir
Type of alarms for plant:	None

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Unknown**
 Maintenance of pretreatment components is: **Good**

Comments/Status:

**Secondary Treatment
(Aeration)**

Color of sludge: **Light Brown**
 Quality of Sludge: **Thin**
 Foam: **Light (white)**
 Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is: **Good**

Comments/Status:

Permit #: 1PZ00019*ED
 NPDES #: Error! Reference source not found.

**Secondary Treatment
(Settling)**

Clarity: **Cloudy**
 Condition of Weir: **Moderate algae/solids build up**
 Weir is level: **Yes**
 Effluent in weir: **Clear**
 Clarifier walls need scraped: **Yes**

Overall maintenance of settling components is: **Good**

Comments/Status:

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Fair**

Comments/Status:

Sludge Handling/Storage Disposal

Hauler name: **MSI, Inc. (Mercer County)**
 Disposal Site: **MSI, Inc.**
 Sludge wasted from: **Sludge holding tank**
 How often is sludge wasted: **On an as needed basis**
 Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

Comments/Status:

Record Keeping/ Operator of Record

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... A
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hard bound book
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - ii. Laboratory results (unless documented on bench sheets)... N
 - iii. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Comments/Status:

Plant Discharge

Discharge point is a: **Catch Basin**
Name of discharge point: Unnamed tributary of Anderson Fork
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

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EFFLUENT LIMIT VIOLATIONS
 (Period of Review: January 2011 – July 2011)

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