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MAUREEN WARE
KA

Sent To
DAVID A. PLUMMER - DAYTON TRAVEL CENTER
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**Environmental
Protection Agency**

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

December 13, 2010

David A Plummer
Dayton Travel Center
PO Box 30
Eaton, Ohio 45320

CERTIFIED MAIL

**RE: Compliance Evaluation Inspection (CEI) and Notice of Violation
Dayton Travel Center
Permit Number 11N00212**

Dear Mr. Plummer:

On December 8, 2010, I conducted a Compliance Evaluation Inspection at the Dayton Travel Center Wastewater Treatment Plant (WWTP). A copy of the inspection report and General Laboratory Criteria is enclosed. The inspection report contains two unsatisfactory rating (Operations & Maintenance, and Effluent/Receiving Waters) and one marginal rating (Records/Reports).

As noted in the CEI, a review of monitoring data reported for outfall 11N00212002 indicates that there have been, and apparently continue to be, levels of pollutants being discharged that violate water quality standards. Dayton Travel Center must either determine what is causing the pollutants to be getting into the oil/water separator and stop them from entering the oil/water separator, or determine a treatment system designed to treat such pollutants to be at or below the numerical limits for outfall 11N00212001. Please note that Part II, paragraph F of your permit states: "This permit may be modified, or alternatively, revoked and reissued, to comply with any applicable water quality effluent limitations."

The outfall for 11N00212002 has only approximately 1.5" fall from the invert of the discharge pipe to the concrete base. This makes sampling during low flow conditions difficult if not impossible. It is strongly recommended that Dayton Travel Center design an outfall configuration to enable sampling during any discharge event.

Please be advised that failure to comply with the requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Please submit a written response to this office by January 14, 2011 indicating the steps you have taken or intend to take to correct the above violation and unsatisfactory/marginal ratings.

Mr. Plummer
December 13, 2010
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If you have any questions or comments concerning the contents of this letter, please feel free to contact me at (937) 285-6103.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maureen M. Ware', with a long horizontal flourish extending to the right.

Maureen M. Ware
Division of Surface Water

MMW/kl

Enclosures

cc: Gary Wagner
cc: Preble County Health Dept.

Permit #: 1IN00212
 NPDES #: OH0118192



State of Ohio Environmental Protection Agency
 Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IN00212	OH0118192	12/8/2010	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Dayton Travel Center 6762 State Rt 127 Eaton, Ohio 45320	11:05 AM	5/1/2009
	Exit Time	Permit Expiration Date
	12:10 PM	4/30/2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Gary Wagner, Operator	937-533-0082	
Name, Address and Title of Responsible Official	Phone Number	
David Plummer 24601 Center Ridge Road Westlake, Ohio 44145	440-808-4431	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	N	Flow Measurement	N	Pretreatment
M	Records/Reports	N	Laboratory	N	Compliance Schedule
U	Operations & Maintenance	U	Effluent/Receiving Waters	S	Self-Monitoring Program
N	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

Records/Reports was rated as marginal due to late reporting for some 002 violations. Operations & Maintenance was rated as unsatisfactory due to pollutants being discharged to the oil/water separator that an oil/water separator is not designed to treat. Effluent/Receiving Waters was rated unsatisfactory due to numerous violations.

Inspector	Reviewer
 Maureen M. Ware Division of Surface Water Southwest District Office Date: 12/13/10	 Martyn Burt Environmental Supervisor Division of Surface Water Southwest District Office Date: 12/13/10

Permit # : 11N00212
NPDES #: OH0118192

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
in permit..... Y
- (f) Storm water discharges properly permitted..... N/E

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... N
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... N
- (e) Compliance schedule contained in..... N/A
- (f) Permittee is in compliance with schedule..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Comments/Status:

The facility has had numerous violations, most from outfall 11N00212002 (see Notice of Violation dated 11/15/10). A review of monitoring data reported for outfall 11N00212002 indicates that there have been, and apparently continue to be, levels of pollutants being discharged that violate water quality standards. Dayton Travel Center must either determine what is causing the pollutants to be discharged into the oil/water separator and then prevent them from entering the oil/water separator, or determine a treatment system designed to treat such pollutants to be at or below the numerical limits for outfall 11N00212001. Please note that Part II, paragraph F of your permit states "This permit may be modified, or alternatively, revoked and reissued, to comply with any applicable water quality effluent limitations.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a) Standby power available.....generator or dual feed N

i. What does the back-up power source operate.....

ii. How often is the generator tested under load.....

(b) Which components have an alarm system available for power or equipment failures.....

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

Calendar

(e) Any major equipment breakdown since last inspection..... N

(f) Operation and maintenance manual provided and maintained..... N

(g) Any plant bypasses since last inspection..... N

(h) Any plant upsets since last inspection..... N

Comments/Status:

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. N
- (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)

hardbound
- (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
 - iii. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... Y
 - v. 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..... N

Comments/Status:

All 001 violations were reported. Mr. Wagner indicated that he is only responsible for sampling 002, not reporting violations for 002.

Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... N/A
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....
 - ii. How many pump stations have telemetered alarms.....
 - iii. How many pump stations have operable alarms.....

- (b) Any chronic collection system overflows since last inspection..... N/A
- (c) Regulatory agency notified of all overflows..... N/A
- (d) Are there CSOs in the collection system..... N/A
if so, what is the LTCP status.....
- (e) How are CSOs monitored (chalk, block, level sensor, etc.).....
- (f) Portable pumps available for collection system maintenance..... N/A
- (g) RDII Program established and active..... N/A
- (h) Any WIB complaint received since last inspection..... N/A
- (i) Is there a WIB response plan..... N/A
- (j) Is any portion of the collection system at or near dry weather capacity..... N/A

Comments/Status:

Section H: Sludge Management

- (a) Method of Sludge Disposal...
 - Land Application
 - Haul to Another NPDES Permittee
 - Haul to a Mixed Solid Waste Landfill
- (b) Has amount of sludge generated changed significantly since the last inspection..... N
- (c) How much sludge storage is provided at the plant.....
6-8 months
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A
- (h) Is a contractor used for sludge disposal..... N/A
If so, what is the name of the contractor.....

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):
water meter
- (b) Flow meter calibrated annually N/A
(Date of last calibration:)
- (c) 24-hour recording instruments operated and maintained..... N/A
- (d) Flow measurement equipment adequate to handle full range of flows..... N/A
- (e) All discharged flow is measured..... N/E

Comments/Status:

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
 (see GLC page)
- (d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y

Comments/Status:

The outfall for 1IN00212002 has only approximately 1.5" fall from the invert of the discharge pipe to the concrete base. This makes sampling during low flow conditions difficult if not impossible. It is strongly recommended that Dayton Travel Center design an outfall configuration to enable sampling during any discharge event.

Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N
- (b) Do SOP's include the following if applicable..... N/A
 - Title
 - Procedure
 - Scope and Application
 - Calculations
 - Summary
 - Quality Control
 - Sample Handling and Preservation
 - Maintenance
 - Interferences
 - Corrective Action
 - Apparatus and Materials
 - Reference (Parent Method)
 - Reagents

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N/A

- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment. N/A
(see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: All but pH, D.O., temperature,
and chlorine.

Lab name: Belmont

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance
sampling..... N/A
Date:
- (b) Were any parameters "Unsatisfactory"..... N/A
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 001 and 002
Outfall Description: both pipes

Receiving Stream: unnamed tributaries of Goose Run
Receiving Stream Description: frozen

Comments/Status:

Outfall 11N00212001 looked clear. Although outfall 11N00212002 was not discharging at the time of the inspection, there was a dark gray residue evident in the invert of the discharge pipe as well as on the concrete base where it discharges.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance
in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N/A
- (d) Do you see unidentified dark smoke or dust clouds coming from

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- sources other than smokestacks..... N
 (e) Do you notice any unusual odors or strong chemical smells..... N
 (f) Do you see any open or unmarked drums, unsecured liquids, or
 damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Station	Reporting Code	Parameter	Units	Date	Reported Value	A Code
2	00300	Dissolved Oxygen	mg/l	5/6/2009	5.9	
2	00300	Dissolved Oxygen	mg/l	6/11/2009	4	
2	00300	Dissolved Oxygen	mg/l	7/10/2009	2	
2	00300	Dissolved Oxygen	mg/l	8/4/2009	6	
2	00300	Dissolved Oxygen	mg/l	9/24/2009	4	
2	00300	Dissolved Oxygen	mg/l	10/1/2009		AL
2	00300	Dissolved Oxygen	mg/l	11/1/2009		AL
2	00300	Dissolved Oxygen	mg/l	12/2/2009	5.7	
2	00300	Dissolved Oxygen	mg/l	1/24/2010	5.6	
2	00300	Dissolved Oxygen	mg/l	2/22/2010	5	
2	00300	Dissolved Oxygen	mg/l	3/13/2010	4	
2	00300	Dissolved Oxygen	mg/l	4/1/2010		AL
2	00300	Dissolved Oxygen	mg/l	5/12/2010	3.4	
2	00300	Dissolved Oxygen	mg/l	6/22/2010	4.9	
2	00300	Dissolved Oxygen	mg/l	7/1/2010		AL
2	00300	Dissolved Oxygen	mg/l	8/1/2010		AL
2	00300	Dissolved Oxygen	mg/l	9/22/2010	0.52	
2	00400	pH	S.U.	5/6/2009	6.8	
2	00400	pH	S.U.	6/11/2009	7.9	
2	00400	pH	S.U.	7/10/2009	5.4	
2	00400	pH	S.U.	8/4/2009	7.2	
2	00400	pH	S.U.	9/24/2009	5.4	
2	00400	pH	S.U.	12/2/2009	6.5	

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2	00400	pH	S.U.	1/24/2010	7.1	
2	00400	pH	S.U.	2/22/2010	7.6	
2	00400	pH	S.U.	3/13/2010	8.5	
2	00400	pH	S.U.	5/12/2010	7.3	
2	00400	pH	S.U.	6/22/2010	6.5	
2	00400	pH	S.U.	9/22/2010	5.2	
2	00530	Total Suspended Solids	mg/l	5/6/2009	31	
2	00530	Total Suspended Solids	mg/l	6/11/2009	21	
2	00530	Total Suspended Solids	mg/l	7/22/2009	46	
2	00530	Total Suspended Solids	mg/l	8/4/2009	28	
2	00530	Total Suspended Solids	mg/l	9/24/2009	91	
2	00530	Total Suspended Solids	mg/l	12/2/2009	140	
2	00530	Total Suspended Solids	mg/l	1/24/2010	36	
2	00530	Total Suspended Solids	mg/l	2/22/2010	54	
2	00530	Total Suspended Solids	mg/l	3/13/2010	37	
2	00530	Total Suspended Solids	mg/l	5/12/2010	90	
2	00530	Total Suspended Solids	mg/l	6/22/2010	27	
2	00530	Total Suspended Solids	mg/l	9/22/2010	212	
2	00552	Oil and Grease, Hexane Extr	mg/l	5/6/2009		AA
2	00552	Oil and Grease, Hexane Extr	mg/l	6/11/2009		AA
2	00552	Oil and Grease, Hexane Extr	mg/l	7/10/2009	16	
2	00552	Oil and Grease, Hexane Extr	mg/l	8/4/2009		AA
2	00552	Oil and Grease, Hexane Extr	mg/l	9/24/2009	13.6	
2	00552	Oil and Grease, Hexane Extr	mg/l	12/2/2009	13.5	
2	00552	Oil and Grease, Hexane Extr	mg/l	1/24/2010	6.77	
2	00552	Oil and Grease, Hexane Extr	mg/l	2/22/2010	2.95	
2	00552	Oil and Grease, Hexane Extr	mg/l	3/13/2010	6.34	
2	00552	Oil and Grease, Hexane Extr	mg/l	5/12/2010	22.1	
2	00552	Oil and Grease, Hexane Extr	mg/l	6/22/2010	23.5	
2	00552	Oil and Grease, Hexane Extr	mg/l	9/22/2010	115	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	5/6/2009	1.52	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	6/11/2009		AA
2	00610	Nitrogen, Ammonia (NH3)	mg/l	7/10/2009	4.28	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	8/4/2009		AA
2	00610	Nitrogen, Ammonia (NH3)	mg/l	9/24/2009	22.3	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	12/2/2009	15.7	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	1/24/2010	1.42	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	2/22/2010	2.42	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	3/13/2010	5.8	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	5/12/2010	9.5	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	6/22/2010	5.54	
2	00610	Nitrogen, Ammonia (NH3)	mg/l	9/22/2010	7.85	
2	00665	Phosphorus, Total (P)	mg/l	5/6/2009	0.321	

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2	00665	Phosphorus, Total (P)	mg/l	6/11/2009	0.147	
2	00665	Phosphorus, Total (P)	mg/l	7/10/2009	1.78	
2	00665	Phosphorus, Total (P)	mg/l	8/4/2009	0.192	
2	00665	Phosphorus, Total (P)	mg/l	9/24/2009	4.58	
2	00665	Phosphorus, Total (P)	mg/l	12/2/2009	4.25	
2	00665	Phosphorus, Total (P)	mg/l	1/24/2010	0.561	
2	00665	Phosphorus, Total (P)	mg/l	2/22/2010	0.879	
2	00665	Phosphorus, Total (P)	mg/l	3/13/2010	0.587	
2	00665	Phosphorus, Total (P)	mg/l	5/12/2010	4.22	
2	00665	Phosphorus, Total (P)	mg/l	6/22/2010	1.51	
2	00665	Phosphorus, Total (P)	mg/l	9/22/2010	7.35	
2	80082	CBOD 5 day	mg/l	5/6/2009	42.4	
2	80082	CBOD 5 day	mg/l	6/11/2009	3.14	
2	80082	CBOD 5 day	mg/l	7/22/2009	939	
2	80082	CBOD 5 day	mg/l	8/4/2009		AA
2	80082	CBOD 5 day	mg/l	9/24/2009	1410	
2	80082	CBOD 5 day	mg/l	12/2/2009	896	
2	80082	CBOD 5 day	mg/l	1/24/2010	138	
2	80082	CBOD 5 day	mg/l	2/22/2010	576	
2	80082	CBOD 5 day	mg/l	3/13/2010	1840	
2	80082	CBOD 5 day	mg/l	5/12/2010	1630	
2	80082	CBOD 5 day	mg/l	6/22/2010		AE
2	80082	CBOD 5 day	mg/l	9/22/2010	1960	

