

**Environmental
Protection Agency**

John Kasich, Governor
Deborah S. S. Lt. Governor
Chris Kinnaman, Director

December 22, 2010

RE: TRAVEL CENTERS OF AMERICA
KINGSVILLE TRAVELCENTER
OHIO EPA PERMIT 3IN00307
KINGSVILLE TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. David A. Plummer, C.P.G., Environmental Associate
TA Operating LLC
Travel Centers of America – Kingsville Travel Center No. 29
24601 Center Ridge Road
Westlake, OH 44145-5634

Dear Mr. Plummer:

On December 21, 2010, a site inspection was conducted at the above referenced facility at 5551 State Route 193, Kingsville Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Dean Corbin, Maintenance Manager, represented TA Operating, LLC (TA) and Roger Osborn represented Clean Streams / Lewis Wastewater Management during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on December 29, 2009.

Industrial and Storm Water Waste Water treatment

The site consists of a truck stop/travel center for both passenger vehicles and commercial trucks. There is a Travel Center and an adjacent Burger King and Country Pride Restaurant. Bulk storage tanks are located underground in distinct areas, with the fuel tanks located along the eastern boundary of the property along State Route 193 north of the passenger fuel islands and northeast of the travel center building; and the waste oil tank is located south of the maintenance garage northwest of the travel center building. The passenger vehicle fueling area is located southeast of the underground fuel tank area, and the commercial vehicle fuel area is located northwest of the underground fuel tank area. A site map is attached.

Water consisting of rainwater which may have incidental contact with fuel products on paved areas around truck scales. Fuel loading-unloading, and dispensing areas have berms, directing wastewater to trench drains and catch basins. Commercial and passenger fuel delivery areas (fuel islands) have canopies to minimize contact with precipitation. Commercial and passenger vehicle parking areas are paved, and these parking areas are routed directly to drainage pipes for discharge as Outfall 002. The wastewater receives no settling prior to discharge to an unnamed tributary to Conneaut Creek via Outfall 002. Commercial fueling areas and commercial fuel delivery area (fuel islands) are routed to a grit chamber for grit and solids removal, then flows to an oil-water separator (OWS). The waste oil tank and floor drains within the maintenance building are routed to an OWS. The OWS discharges to the storm sewer system to ultimate discharge as Outfall 002.

Plant Sanitary Waste Water Treatment:

Plant sanitary wastes consisting of domestic wastes from the restaurants and restrooms are conveyed to a package wastewater treatment plant. Kitchen wastes flow through a grease trap. All sanitary wastes flow to a flow equalization basin, followed by an extended aeration unit, then followed by an up-flow filter, then to a dosing chamber then to a slow surface sand filter. Disinfection

is accomplished by ultraviolet disinfection. The plant was upgraded to a hydraulic capacity of 12,000 gpd.

Observations

The following observations were made during the inspection.

Package Treatment Plant – Outfall 001

1. The design flow of the extended aeration plant is 12,000 gallons per day, although the effluent loadings are maintained at 10,000 gpd. The plant operates continuously.
2. The Burger King and Country Pride restaurants, the store, showers, two men's restrooms, and one women's restroom are tied into the wastewater treatment plant.
3. Mr. Corbin noted that the facility recently converted its standard washing machines to high efficiency washers. The package plant receives sanitary wastes from restrooms, showers, and restaurants, as well as the laundry.
4. Mr. Corbin noted that sludge had recently been removed from the sludge holding tanks. The sludge pump had to be replaced, resulting in excess sludge in the aeration system, clarifiers, and sand filters.
5. The plant is operated by Mr. Roger Osborn of Clean Streams/Lewis Wastewater Management on behalf of TA. Clean Streams collects samples, performs laboratory analyses, and electronically submits the data to the electronic discharge monitoring report (eDMR) system.
6. The overall condition of the treatment plant during this inspection was satisfactory with the plant maintained.
7. The equalization basin and extended aeration plant blowers were cycled and found in operating condition. Collected trash was containerized for disposal at a solid waste landfill. A significant amount of foaming was noted in the equalization basin.
8. The content of the aeration tank had a good color and mixing. Sludge returns were a medium brown color. The aeration tanks had a significant amount of foaming. See attached pictures. The source of the excessive foaming is likely a phosphate source. The restaurants and laundry facilities should be examined for recent changes in phosphates and surfactants and low foaming and low phosphate cleaners should be substituted.
9. The surface of the clarifier was clear, and the skimmer appeared to be operating as designed. Effluent channels and clarifier sidewalls were reasonably clean. There was a leaking valve noted in the clarifier (see attached pictures). This should be repaired as soon as possible.
10. The up-flow filter horizontal joint on the outfall box was noted as leaking. This should also be repaired as soon as possible.

11. The dosing pumps for the slow surface sand filters were cycled and found in operating condition. The sand filter distribution box was noted in deteriorated condition, and should be replaced.
12. The plant was discharging to the north sand filter during the inspection. The sand filter was noted as flooded and slowly draining (see attached picture). Mr. Corbin noted that the sand was replaced in both sand filters in August 2010, and that the slow draining is likely attributed to sludge buildup on the sand from solids carryover from the work on the sludge tanks earlier in the month. The distribution box should direct the flow to the south filter and the north filter cleaned on any accumulated sludge. Note that the sludge must be containerized and disposed as a solid waste. Ohio EPA also notes the foaming carryover from the aeration and flow equalization.
13. The ultraviolet disinfection system was not operating, as it was outside of the disinfection season of May through October. The outlet of the disinfection system is also noted as having excessive foaming (see attached picture). Sources of excessive foaming must be eliminated from the wastewater sources.
14. The final effluent at Outfall 001 was not observed due to accessibility issues due to snowfall.

Storm Water System – Outfall 002

15. The OWS system appears in proper working order. Oil and grease are removed approximately every two months. The last removal occurred in early December 2010.
16. The design flow of the storm water system is approximately 144,000 gpd (200 gpm). The flow is dependent upon precipitation events. Storm water from the fuel delivery and dispensing areas, as well as floor drains from the maintenance shop receive treatment through the OWS units. Remaining storm water in the parking lot areas do not receive treatment prior to discharge.
17. Permit 3IN00307 does not contain storm water language (Parts 4, 5, and 6) or require a storm water pollution prevention plan (SWPPP). We discussed the fact that TA will likely have these requirements when this permit is renewed.
18. No evidence of discharges was noted from the roll-off box storage area (see attached pictures).
19. The outfall signage required by Part II of your NPDES permit was removed by vandals. Per discussions with Mr. Corbin, this sign will be replaced as soon as possible.
20. The final effluent at Outfall 002 was observed of satisfactory visual quality. The final discharge at the unnamed tributary was observed as clear.

NPDES Permit Compliance Review

TA operates the Kingsville Travel Center No. 29 under Permit 3IN00307*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period December 1, 2009 through December 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.42	6.58	12/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.74	6.58	12/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.29388	12/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.29388	12/1/2009
001	00530	Total Suspended Solids	30D Conc	9.91	10.	1/1/2010
001	00530	Total Suspended Solids	30D Qty	0.45	.65102	1/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.42	2.94	1/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.1914	1/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.17	.1914	1/8/2010
001	00530	Total Suspended Solids	30D Conc	9.91	12.	2/1/2010
001	00530	Total Suspended Solids	30D Conc	9.91	10.	3/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.11891	4/1/2010
001	00530	Total Suspended Solids	30D Conc	9.91	12.	6/1/2010
001	00530	Total Suspended Solids	30D Qty	0.45	.59046	6/1/2010
001	00530	Total Suspended Solids	30D Conc	9.91	10.	7/1/2010
001	00530	Total Suspended Solids	30D Conc	9.91	10.	11/1/2010

A written explanation as to why these events occurred must be provided, along with measures to ensure that it is not repeated. If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Reporting Violations

The following reporting code violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00530	Total Suspended Solids			AF	1/1/2010
002	00400	pH			AF	1/1/2010
002	00550	Oil and Grease, Total			AF	1/1/2010
002	00056	Flow Rate			AF	1/1/2010
002	00530	Total Suspended Solids			AF	2/1/2010
002	00400	pH			AF	2/1/2010
002	00550	Oil and Grease, Total			AF	2/1/2010
002	00056	Flow Rate			AF	2/1/2010

The use of the "AF" code is limited to when a sample cannot be collected because the designated sampling site was flooded or frozen-over. This code should be used for all parameters required to be

Mr. David A. Plummer
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sampled at the site on the day that it was inaccessible. However, these parameters are to be collected monthly as a grab sample. It is unlikely that the outfall was frozen, flooded, or otherwise inaccessible for two entire months. It is the expectation of Ohio EPA that onsite personnel monitor the outfall on a daily basis during the winter season and that appropriate samples be collected as soon as the outfall is accessible, even if it is not on the usual day that the sample is collected during the month. A written explanation must be provided as to why these events occurred that data was unable to be collected, along with measures to ensure that they are not repeated.

Compliance Schedule Violations

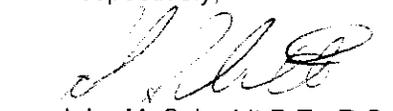
NPDES Permit 3IN00307*CD does not contain a compliance schedule, therefore there are no compliance schedule violations.

Based on the above information, the TA operating LLC is considered to be in substantial compliance with the terms and conditions of the NPDES permit for its Travel centers of America – Kingsville Travel Center No. 29 Kingsville Ohio facility. However, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,

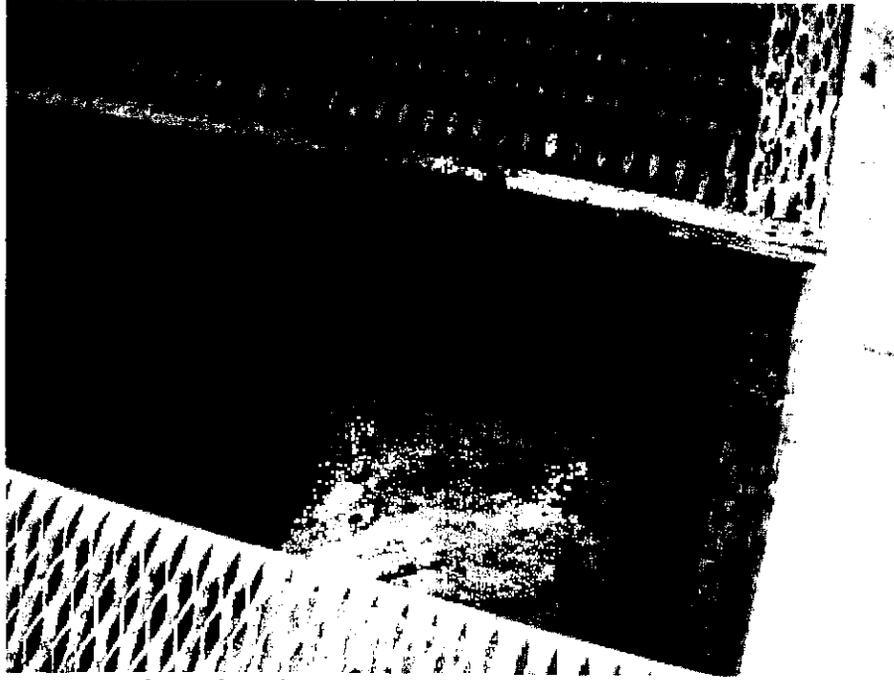


John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

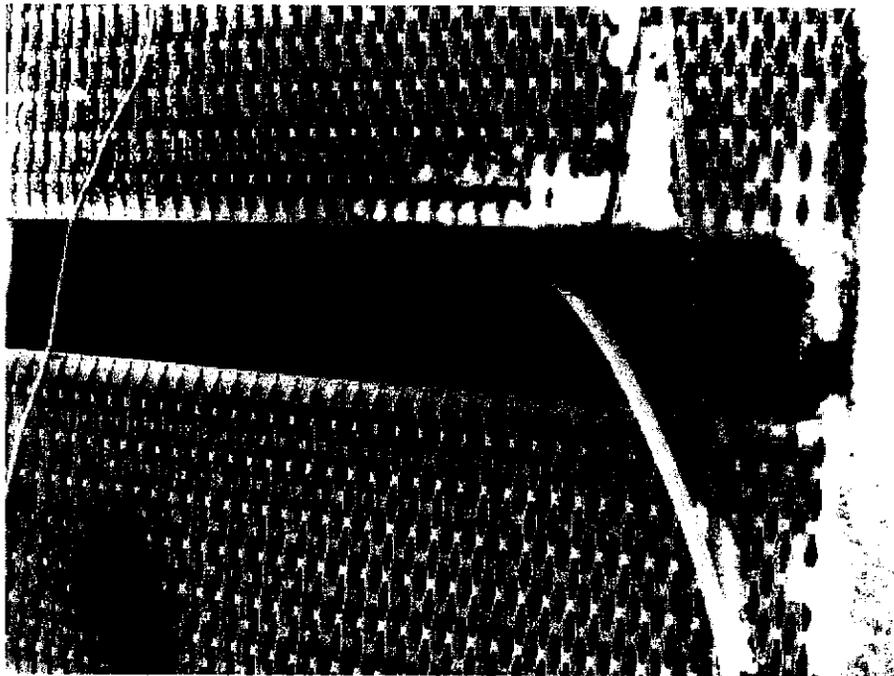
JMS/mt

pc: Dustin Lewis, Lewis Wastewater Management

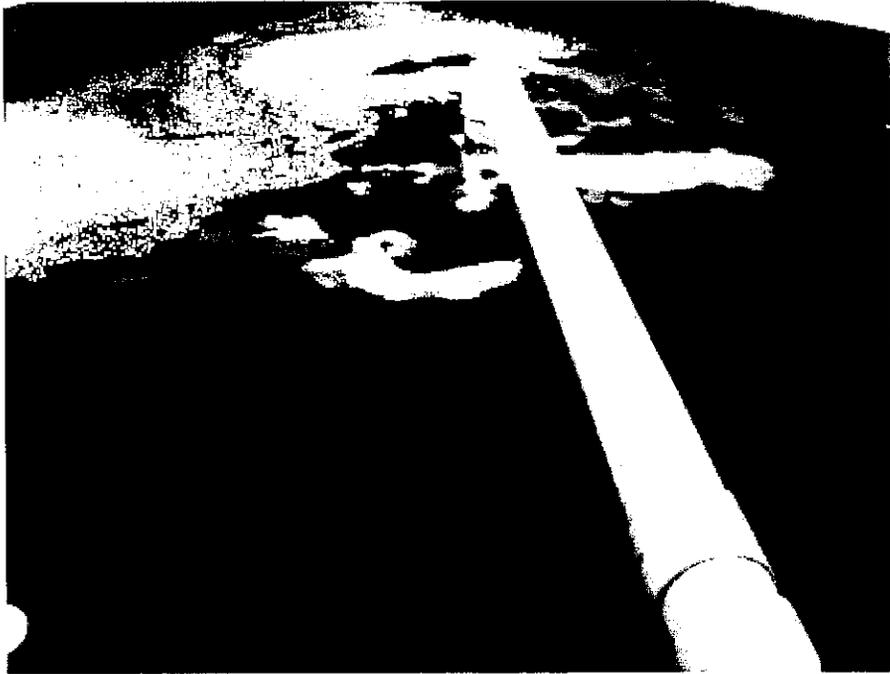
File: Industrial – Travel Centers of America – Kingsville Travel Center No. 29 (Kingsville)/pc



Aeration System with Excessive Foaming



Clarifier with Leaking Air Valve



North Slow Sand Filter Flooding



Excessive Foaming at Disinfection Tank Outlet



Roll Off Boxes with Lids



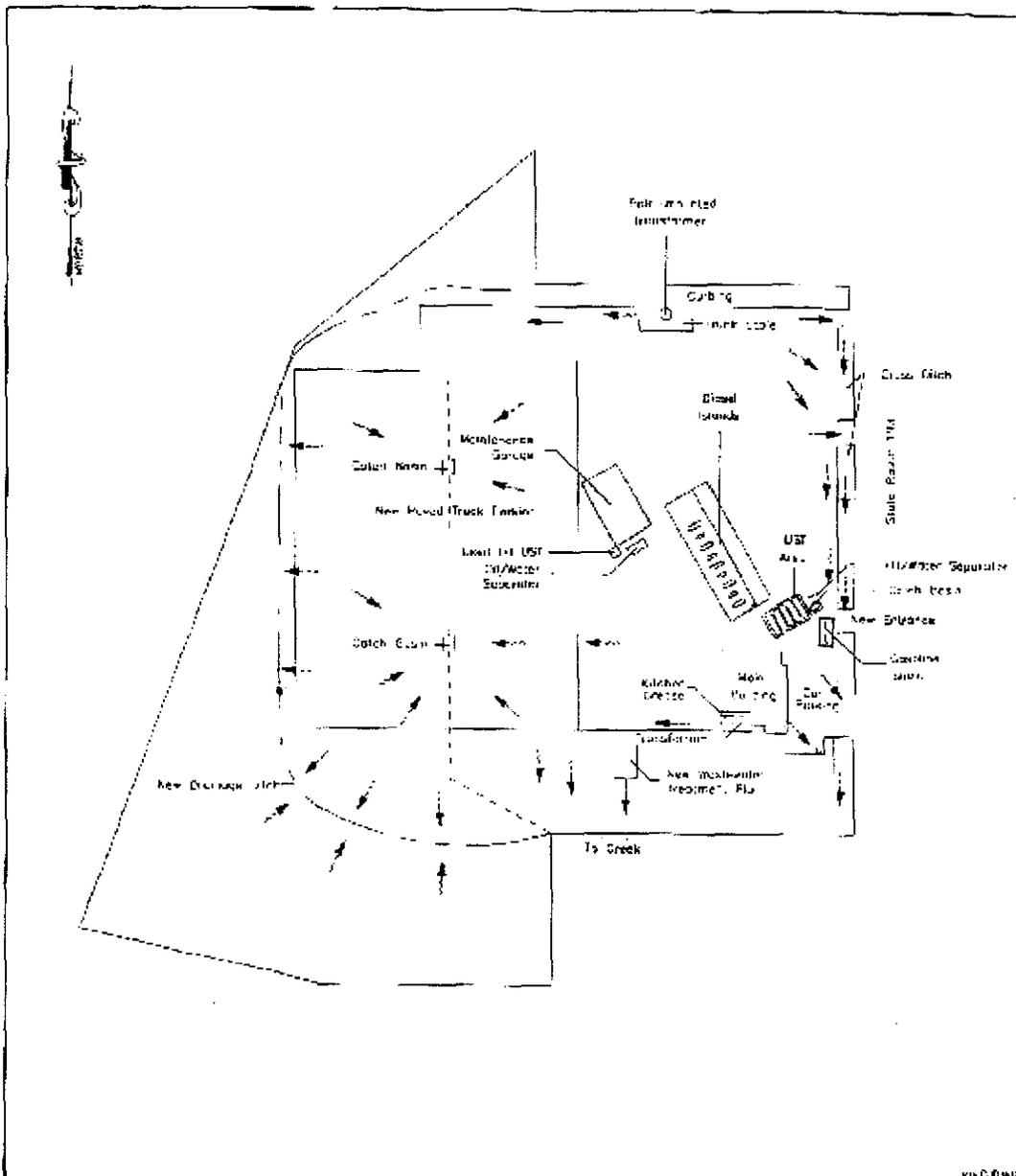
OWS Unit at Fuel Delivery and Fuel Dispensing Areas



OWS for Truck Repair Area



Fuel Dispensing Areas



KIND0010

	<p>LEGEND</p> <p>→ direction of Stormwater flow or Split</p>	<p>TRAVELCENTERS OF AMERICA</p>					
		<p>Figure 2. Site Plan Kingsville TravelCenter Kingsville, Ohio</p>					
	<table border="1"> <tr> <td>Drawn By:</td> <td>Date:</td> <td>Scale:</td> </tr> <tr> <td>SAH</td> <td>04-29-99</td> <td>NTS</td> </tr> </table>	Drawn By:	Date:	Scale:	SAH	04-29-99	NTS
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