

**Environmental
Protection Agency**

Gov. Ed Brown, Governor
Lieke Freese, Lt. Governor
Chris Kemnitz, Director

December 22, 2010

RE: PILOT TRAVEL CENTER NO. 002
OHIO EPA PERMIT 3IG00089
AUSTINBERG TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

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

Dear Mr. Cupp:

On December 21, 2010, a site inspection was conducted at the above referenced facility at 2246 State Route 45, Austinburg Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Paul Smith, Facility General Manager, represented Pilot Travel Centers, LLC (Pilot) and we spoke with you via telephone 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 November 12, 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 Pilot Oil Travel Center and an adjacent Subway Restaurant. Bulk storage tanks are located underground in distinct areas, with the passenger fuel tanks located along the northern boundary of the property along the Interstate 90 eastbound onramp north of the passenger fuel islands west of the travel center building; and commercial fuel tanks located east of the commercial vehicle fueling area east of the travel center building.

Water consisting of rainwater which may have incidental contact with fuel products on paved areas around fuel loading, unloading, and dispensing areas is collected in trench drains and catch basins. Commercial and passenger fuel delivery areas (fuel islands) have canopies to minimize contact with precipitation. Passenger fueling areas, passenger fuel delivery area (fuel islands), and passenger and truck vehicle parking areas are routed directly to the Environmental Control Pond (ECP), located to the east of the paved area. The wastewater receives settling prior to discharge to Coffee Creek via Outfall 001. 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 OWS discharges to the ECP then to ultimate discharge as Outfall 001.

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Plant Sanitary Waste Water Treatment:

Plant sanitary wastes are conveyed sanitary sewers located along State Route 45 and conveyed south to the Coffee Creek Wastewater Treatment Facility operated by the Ashtabula County Department of Environmental Services (DES). Sanitary discharges from both the Pilot Travel Center and the Adjacent Subway Restaurant are not a part of this NPDES permit.

Observations

The following observations were made during the inspection.

1. Water spigots were noted in the commercial vehicle fueling areas. Mr. Smith noted that these were used, in conjunction with step ladders, at one time to allow commercial vehicle drivers to wash vehicle windows, but was discontinued due to safety and liability issues (see attached pictures).
2. The grit removal system appears in proper working order. Grit and screening levels are monitored weekly, and removed when grit levels exceed 36 inches, generally annually. Grit and screenings accumulation is light, with materials removed as part of trench drains on March 10, 2010.
3. The OWS system appears in proper working order (see attached photo). Oil and grease levels are checked weekly, and oil and grease is pumped when oil levels exceed 20 inches, generally every six to twelve months. The last removal occurred in July 2010.
4. The design flow of the wastewater treatment system is approximately 144,000 gpd (200 gpm). The flow is dependent upon precipitation events.
5. There was a petroleum sheen observed from vehicle drag-out from the commercial fuel delivery area beyond the trench drains south of the fuel islands.
6. The ECP was observed to contain cattails, phragmites, and other vegetative growth throughout, with a ponding of turbid water in the center (see attached picture). This is unchanged from the November 12, 2009 inspection. The water level in the pond appeared to be well below the high-level overflow outlet structure; and the sides of the pond embankment and overflow structure exhibited no visible evidence of an oily residue.
7. Since the November 12, 2009 inspection, Pilot executed a consent order with the state of Ohio concerning its travel centers throughout the state, including this facility. The consent order requires Pilot to operate and maintain the treatment system in compliance with Ohio Revised Code (ORC) Chapter 6111 and the

associated NPDES permit. The orders also prohibit Pilot from installing a new component or modifying the existing system with first obtaining a permit to install (PTI) from Ohio EPA.

8. Documents inspected during the site visit include a portion of the spill control and countermeasure plan (SPCC) that addresses storm water that contains some elements of a storm water pollution prevention plan (SWPPP), and appears to have been updated in August/September 2010. The latest annual site certification inspection was unable to be located during the inspection.
9. No evidence of discharges was noted from the roll-off box storage area.
10. Outfall 001 was snow covered and not discharging at the time of the inspection.

NPDES Permit Compliance Review

Pilot operates the Pilot Travel Center No. 002 under Permit 3IG00089*BD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2009 through December 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

No limit violations were noted for the period reviewed.

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
001	00400	pH			AH	8/19/2010
001	00550	Oil and Grease, Total			AH	8/19/2010

A written explanation as to why these events occurred that data was unable to be collected, along with measures to ensure that they are not repeated. No additional response is required at this time to address these exceedences.

Compliance Schedule Violations

NPDES Permit 3IG00089*BD does not contain a compliance schedule, however the following items are noted with February 23, 2010 Consent Order:

- Part IV, Item 7: Comply with ORC 6111 and rules adopted hereunder and Permit 3IG00089*BD (immediate);
- Part V (A), Item 9: Reporting requirements for Permit 3IG00089*BD (immediate);

- Part V (B), Item 10: Reporting requirements for discharges and releases to waters of the state (immediate);
- Part V (C), Item 11: Reporting requirements for discharges and releases to areas other than waters of the state (immediate);
- Part V (D), Item 12: Prohibit discharge of detergents, antifreeze, and/or surfactants to OWS, ECPs, or waters of the state (immediate);
- Part V (D), Item 13: Update OWS inspection logs to reflect Item 12 (45 days);
- Part V (E), Item 14: Require as-built PTI applications for sites without a PTI (immediate);
- Part V (E), Item 15: Require NPDES permit for any unpermitted point discharge (immediate);
- Part V (G), Item 17: Require a PTI for any new or modification of existing systems without a PTI (immediate);
- Part V (I), Item 25: Submit report to Ohio EPA confirming presence or lack thereof an OWS (90 days);
- Part V (I), Item 26: Submit report to Ohio EPA confirming presence or lack thereof an ECP, description of ECP drainage area, and presence or lack thereof a turn-down 90 valve, and indicating the location of the turn-down 90 valve (90 days).
- Part V (I) Item 27: If any structures in Items 25 and 25 are lacking, submit a PTI for those items (180 days);
- Part V (I), Item 28: Install, operate, and maintain ECPs, OWS, and turn-down 90 valves (upon PTI approval if new, immediate for existing);
- Part V (I), Item 30: Install locks on OWS covers (90 days);
- Part V (J), Item 31: Comply with SPCC plan (immediate);
- Part V (J), Item 32: Submit documentation to NEDO (varies with item);
- Item V (J), Item 33: Revise and resubmit deficient items (14 days of notification);

Ohio EPA files do not reflect compliance with the February 23, 2010 compliance schedule for Items 13, 25, 26, 30, or 32, therefore Ohio EPA could not ascertain compliance with Items 12, 14, 15, 17, 27, or 28. No revised SPCC plan has been received; therefore Ohio EPA is unable to ascertain if Pilot has complied with Item 31 of the February 23, 2010 Orders.

During the inspection, Pilot provided documentation that the OWS log had been updated (Consent Order Part V (D), Item 13), and that the SWPPP itself had been updated (Consent Order Part V (D), Item 12) to reflect the prohibition of surfactants, detergents, and antifreeze, however specific dates that these were accomplished was not evident from the documents inspected. Please provide a response that addresses the consent orders as they pertain to the Pilot Travel Center 002.

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During the inspection, it was apparent that this location has the OWS, ECP and a turn-down 90 valve as specified in the Consent Order, Part V (I), Item 25 through 28. However, Pilot was supposed to document this to Ohio EPA for each site that the facility has in the state of Ohio.

Other NPDES Permit Violations

Storm Water Pollution Prevention Plan: Pursuant to Part IV, Item A, a Storm Water Pollution Prevention Plan (SWPPP) was to have been prepared within 6 months of the effective date of this permit, with the plan implemented within 12 months of the date of this permit. A review of available documents during the December 21, 2010 site visit, it was unclear to Ohio EPA if the excerpt of the SPCC document provided during the inspection is in fact the SWPPP as prescribed by your permit. Some federal regulatory guidance may be helpful in preparing or revising the SWPPP. These include:

- Developing your Storm Water Pollution Prevention Plan, A Guide for Industrial Operators, February 2009, EPA 833/B-09/002
- Industrial Storm Water Fact Sheets: Transportation and Automotive Sector, December 2006, EPA 833/F-06/043

NPDES Permit Renewal:

Ohio EPA is in receipt of your NPDES permit renewal application. The application was prepared and submitted by Dynamis on behalf of Pilot Travel Centers, LLC. A review of the application found the following items deficient:

1. *Form 1, Item XII Nature of Business*: Your brief description must also acknowledge that operations generate domestic sewage that is conveyed to sanitary sewers and thus are not a part of this NPDES permit. The NPDES permit pertains only to storm water management comingled with any spills from the fuel delivery and dispensing operations.
2. *Form 2C Item B Outfall Description and Average Flow*: The oil water separator is also considered a floatation method of separation, using code 1-H.
3. *Form 2C Item IV Improvements required by Federal, State, or Local Authorities*: This section should reference the February 23, 2010 statewide consent order which references this site and the specific items applicable to this facility through these orders.
4. *Form 2C Item V Intake and Effluent Characterization*:

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- a. *Part A - BOD, COD, TOC, TSS, and Ammonia-N Samples:* The concentrations reported in the NPDES renewal are higher than expected. Please verify the location of where samples were taken. For reference, samples should be taken as a free-flowing sample from Outfall 001 (outlet of the ECP) and not within the pond itself. If the sample was taken from the pond itself, then the Outfall should be re-sampled when there is a free-flowing discharge from Outfall 001. As noted below, Outfall 001 and the outlet of the OWS separator unit must be sampled for BTEX (benzene, toluene, ethylbenzene, and xylene) and TPH (total petroleum hydrocarbons) and included with the NPDES renewal.
- b. *Part B Pollutants believed Absent or Present:* It is unclear why the pollutants benzene, toluene, ethylbenzene, and xylene are not included in this listing. Based upon the operations at this location of fuel delivery and dispensing with the potential for releases and an OWS as a treatment device, there is the potential for these pollutants to be present in the final effluent. Sampling for these pollutants as well as TPH should be included with the parameters listed in Part A.
- c. *Part D - Additional Parameters* This section should list BTEX and TPH as potential pollutants, as your OWS is a treatment unit installed to remove these parameters.

Failure to Maintain an Engineered Component: From observations of the ECP, it appears that this pond is short circuiting and has accumulated a significant amount of sediments and vegetation. The pond should be scheduled for cleaning as soon as weather permits. Considerations should also be made to installing baffles to prohibit the pond from short circuiting.

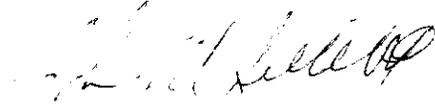
Based on the above information, the Pilot Travel Centers, LLC is considered to be in marginal compliance with the terms and conditions of the NPDES permit for its Pilot Travel Center No. 002 Austinburg Ohio facility. However, the above items must be addressed.

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.

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

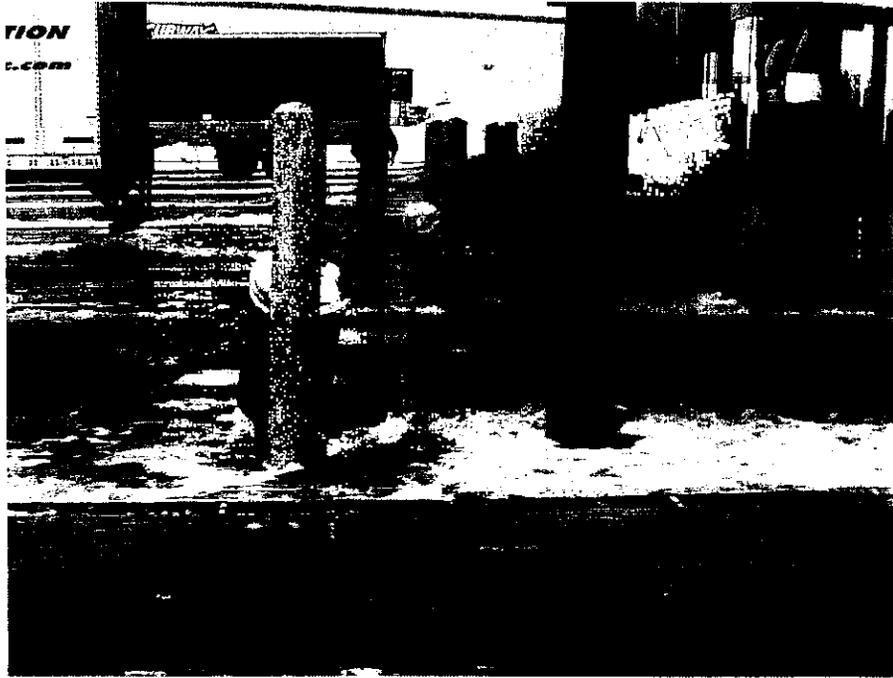
Respectively,



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

JMS/mt

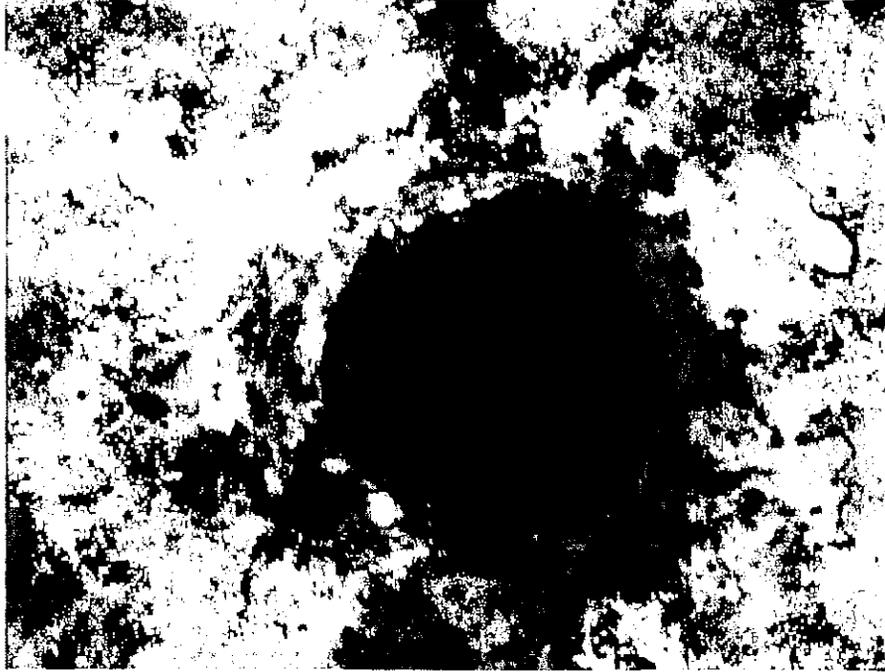
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Commercial Vehicle Dispensing Areas with Water Spigots



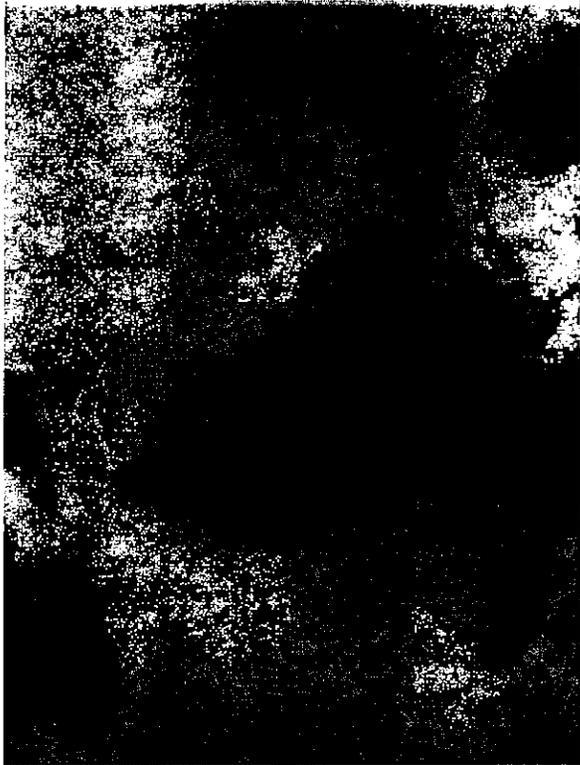
Passenger Vehicle Fueling Areas



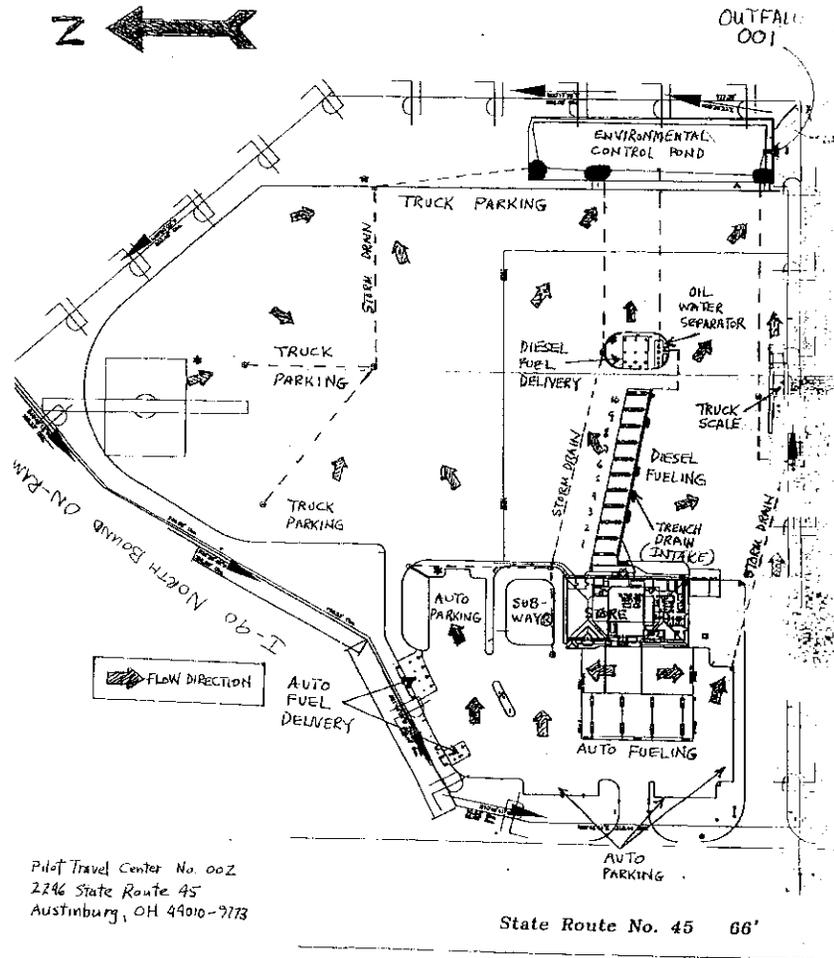
Oil Water Separator



Environmental Control Pond (ECP)



Outfall 001 (Not Discharging)



Pilot Travel Center No. 002
 2246 State Route 45
 Austintburg, OH 44910-9773