



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 11, 2008

RE: LAKE COUNTY
KIRTLAND
SPEEDWAY SUPERAMERICA LLC
STORE # 3201
NPDES PERMIT NO. 3PR00450
APPLICATION NO. OH0139483

Mr. J. Mitchell Oliver
Corporate Environmental Manager
P.O. Box 1500
Springfield, OH 45501

Dear Mr. Oliver:

On April 2, 2008, this writer conducted a compliance evaluation inspection of the wastewater treatment plant that serves the above referenced facility. The purpose of the inspection was to evaluate the facility's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

The plant consists of a 2,000 gallon per day (gpd) extended aeration plant followed by filtration and disinfection. The plant discharge is pumped to a storm sewer. At the time of inspection, the plant was producing an effluent of satisfactory visual quality in that there was no evidence of foam, debris, oil or grease. All treatment units were operational.

The following observations were noted:

- The aeration plant appears underloaded. The aeration tank mixed liquor contained very little solids. The return sludge line contained very little activated sludge. The skimmer return line was not discharging. The return sludge rate should be adjusted. The level of the skimmer should be adjusted in the settling tank.
- The wastewater in the settling tank was turbid.
- The filter beds contained a significant amount of pine needles that must be removed. Assurances must be made that each filter bed contains 18 inches of Ohio EPA approved filter sand. Approved filter sand consists of washed, clean sand with an effective size between 0.4 mm and 1.0 mm, and a uniformity coefficient not greater than 3.0. The filter sand must be raked and evenly distributed across the surface area of the bed.
- The disinfection season is from May 1st through October 31st. During this period chlorine tablets must remain in the chlorinator and sulfite tablets must remain in the dechlorinator.

A review of the plant's Discharge Monitoring Reports (DMRs) for the period of March 2007 through January 2008 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	3.1	6/6/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	4.8	8/15/2007

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The DMR review revealed the following frequency violations:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	03/15/2007
001	00083	Color, Severity	1/Week	1	0	03/15/2007
001	01330	Odor, Severity	1/Week	1	0	03/15/2007
001	01350	Turbidity, Severity	1/Week	1	0	03/15/2007

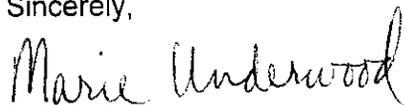
Also, this office does not have record of receipt of the discharge monitoring reports for February 2008. As stated in Part III of your NPDES permit, discharge monitoring reports that are submitted electronically must be transmitted to Ohio EPA by the 20th day of the month following the month-of-interest. Reports that are submitted in the hardcopy format on the Ohio EPA 4500 form must be received no later than the 15th day of the month following the month-of-interest.

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring, reporting, or compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

Pursuant to Ohio Administrative Code 3745-7-09, effective December 21, 2006, this Agency requires the owner and operator of record of a wastewater treatment plant to maintain operation and maintenance records for the wastewater treatment plant. The records shall be housed on site and shall be accessible for twenty-four hour inspection. Some of the information that must be recorded includes the identification of the treatment works, date and times of arrival and departure for the operator of record, specific operation and maintenance activities that affect the quality or quantity of sewage or effluent produced, results of tests performed and samples taken, performance of preventative maintenance and repairs, and identification of the persons making the entries. In addition the administrative code requires any owner of a sewage treatment works who enters into a contract with a certified operator to maintain a copy of the contract onsite at the treatment works. Please carefully review Ohio Administrative Code 3745-7-09 for information on all requirements. The code can be accessed at: <http://www.epa.state.oh.us/dsw/rules/effectiverules.html>.

Should you have any questions, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E
Environmental Engineer
Division of Surface Water

MU/mt

cc: Jeff Torosian, Site Manager