



Environmental
Protection Agency

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

May 25, 2012

Dave Schwall, Operations Manager
Mid-Ohio Sports Car Course
P.O. Box 3108
Lexington, OH 44904

**Re: Mid-Ohio Sports Car Course
NPDES Permit 4PX00053/ OH0136565
Semi-Public CEI
Morrow County**

Dear Mr. Schwall:

On May 9, 2012, a Compliance Evaluation Inspection was conducted at the Mid-Ohio Sports Car Course. Present for the inspection were Larry Hanes from Hanes Enviro, representing Mid-Ohio and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

The inspection raised several concerns which must be addressed in the following areas:

Effluent Flow Values - A review of effluent flow values showed high flows from 74,000 – 219,000 gpd. The plant operator indicated that these reading were not accurate. Please review and improve the reporting and recordkeeping associated with the effluent flow values prior to the formal submittal of eDMR data. Reporting erroneously high flow values can result in effluent loading violations.

Car Washing - The previous inspection identified problems associated with the car washing activities at the track. The operations manager was not available at the time of the inspection so I would anticipate that a follow-up site visit will be conducted to evaluate modifications taken to mitigate impacts from car washing activities.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at mike.sapp@epa.ohio.gov.

Sincerely,

Michael Sapp
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Mike Sapp

MS/nsm Mid-Ohio 12

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PX00053	OH0136565	CEI	S	
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/9/2012	9:30 AM	11:30 AM	No	No

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Mid-Ohio Sports Car Course 7721 Lexington-Steam Corners Road Lexington, Ohio 44904	11/1/2008
	Permit Expiration Date
	10/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Larry Hanes, Contract Operator – Hanes Enviro	
Name and Title of Responsible Official	Phone Number
Dave Schwall, Maintenance Supervisor	(419) 884-4578

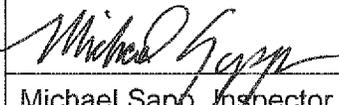
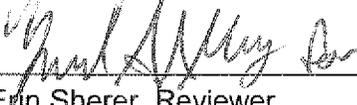
SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S	NPDES Compliance	
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
M	Flow Measurement	Inaccurate high flow readings
M	Receiving Waters	Effluent violations
S	Laboratory	

Comments:

Signatures

	5/16/12		5/14/12
Michael Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

**Compliance Data for Mid-Ohio Sports Car Course between 11/1/2008
to 4/1/2012**

Summary

Permit Effluent Limit Violations: 25
 Permit Effluent Code Violations: 1
 Permit Effluent Frequency Violations: 75
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit Value	Reported Value	Violation Date
May 2009	001	Total Suspended Solids	30D Conc	12	13.6666	5/1/2009
May 2009	001	CBOD 5 day	30D Conc	10	18.	5/1/2009
May 2009	001	Total Suspended Solids	7D Conc	18	23.	5/8/2009
May 2009	001	CBOD 5 day	7D Conc	15	40.	5/15/2009
June 2009	001	Total Suspended Solids	30D Conc	12	19.75	6/1/2009
June 2009	001	Total Suspended Solids	7D Conc	18	42.	6/1/2009
June 2009	001	Dissolved Oxygen	1D Conc	6.0	4.48	6/17/2009
June 2009	001	Dissolved Oxygen	1D Conc	6.0	3.81	6/24/2009
July 2009	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	3.615	7/1/2009
July 2009	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	7.07	7/1/2009
July 2009	001	Dissolved Oxygen	1D Conc	6.0	5.	7/1/2009
July 2009	001	Dissolved Oxygen	1D Conc	6.0	4.	7/19/2009
July 2009	001	Dissolved Oxygen	1D Conc	6.0	5.81	7/23/2009
August 2009	001	Total Suspended Solids	30D Conc	12	33.	8/1/2009
August 2009	001	Total Suspended Solids	7D Conc	18	20.	8/1/2009
August 2009	001	CBOD 5 day	30D Conc	10	12.	8/1/2009
August 2009	001	Dissolved Oxygen	1D Conc	6.0	4.54	8/4/2009
August 2009	001	Total Suspended Solids	7D Conc	18	46.	8/8/2009
August 2009	001	CBOD 5 day	7D Conc	15	19.	8/8/2009
August 2009	001	Dissolved Oxygen	1D Conc	6.0	3.44	8/11/2009
November 2011	001	Total Suspended Solids	30D Conc	12	19.75	11/1/2011
November 2011	001	Total Suspended Solids	7D Conc	18	33.	11/1/2011
November 2011	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	9.035	11/1/2011
November 2011	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	18.	11/8/2011
November 2011	001	Total Suspended Solids	7D Conc	18	23.	11/15/2011

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
April 2010	001	pH	AB	4/26/2010

Flow Data for Mid-Ohio Sports Car Course between 11/1/2008 and 4/1/2012

	Date	Flows (MGD)
Ten Highest Flows	4/13/2010	0.219
	4/10/2010	0.205
	4/11/2010	0.205
	4/12/2010	0.205
	3/3/2012	0.074
	3/4/2012	0.074
	3/5/2012	0.074
	7/18/2010	0.027
	8/6/2010	0.026
	8/7/2010	0.026
Average Flow Rate		0.008

Method of flow monitoring:	Time elapsed meters on tertiary dosing pumps
Type of alarms for plant:	Audible and visual alarms on influent pump station and dosing station

SECTION D: PRETREATMENT

Type of Pretreatment: trash traps (2)
 Does the Trash Trap need pumped: no
 Maintenance of pretreatment components is: satisfactory

Comments/Status: (see attached)

SECTION E: PRIMARY TREATMENT

Color of sludge: light brown
 Quality of Sludge: good
 Foam: no
 Odor: no

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

Maintenance of aerating equipment is: satisfactory

Comments/Status: (see attached)

SECTION F: SECONDARY TREATMENT

Clarity: clear
 Condition of Weir: good
 Weir is level: yes
 Effluent in weir: yes
 Clarifier walls need scraped: no
 Sludge Blanket visible: no
 Pin floc observed: no
 Overall maintenance of settling components is: satisfactory

Comments/Status: (see attached)

SECTION G: TERTIARY TREATMENT

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

Overall maintenance of components is: satisfactory

Comments/Status: (see attached)

SECTION H: SLUDGE HANDING / STORAGE DISPOSAL

Hauler name: unknown

Disposal Site: unknown

Sludge wasted from: clarifier

How often is sludge wasted: monthly

Sludge drying beds: no

Sludge holding tank: yes

Overall maintenance of components is: satisfactory

Comments/Status: (see attached)

SECTION I: 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.....IV
- (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)....
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met.....NA
- (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)...
 - 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:

SECTION J: PLANT DISCHARGE

Discharge point is a: field tile
Name of discharge point: field tile to unnamed tributary
Discharge is visible: yes (500 yards from plant) Quality of Effluent: good

Comments/Status

SUMMARY OF FINDINGS AND COMMENTS Mid Ohio Sports Car Course

The wastewater treatment plant serving the Mid Ohio Sports Car Course consists of an influent lift station, trash trap, flow equalization basin, extended aeration with conventional clarification, fixed media clarification, dosing, tertiary sand filtration, chlorination and dechlorination. The plant was installed in 1986 and was issued NPDES permit coverage in November 2008. Effluent from the plant enters a drainage tile prior to discharge to an unnamed tributary to the Clear Fork Mohican River. The plant has a design flow of 30,000 gpd.

1. The following activities or facilities generate wastewater which is tributary to the wastewater treatment plant:
 - The facility holds four large events each year (Indy car race, Toyota Grand Prix and two motorcycle races)
 - Goodyear tower and paddock areas
 - All facilities located within the infield area
 - Dump station located in campgrounds
 - Maintenance building, food prep areas (with grease trap) employees and spectator showers
 - Driving schools (157 schools/year with schools 1-3 days in duration)
 - Sports car club events
2. The ticket office and utilities complex at the front of the facility are served by an on-site septic and leaching system. Portable toilets are brought in for large race events. The facility had previously experienced problems with septic haulers dumping at the plant during large events. This practice has been discontinued and the septic haulers are now required to haul and dump at a larger facility.
3. At the time of the inspection, the following general observations were made with the operational practices at the treatment plant:
 - The plant has two trash traps which are pumped out once a year.
 - The sludge holding tank is not currently being utilized.
 - Sludge is periodically wasted from the clarifier by a contract hauler.
 - Thirty minute settleability tests are used to determine when wasting is

necessary.

- The fixed media filters are washed down on an as needed basis.
 - The aeration blowers are being operated in an on/off mode of operation. The 24 hour cycle generally runs the blowers for 14 hours/day.
 - The media in the tertiary sand filter was replaced since the previous inspection. The filters previously contained pea gravel instead of filter sand.
 - Larry Hanes visits the plant 3 days/week.
 - Alloway Labs performs contract laboratory analyses for all parameters except pH, temperature and dissolved oxygen.
 - The plant was pumped out in December 2011 due to a spill of latex paint.
 - The plant is shut down at the end of November and has little or no flow from December – February.
 - A portion of the security fence around the plant had been removed to allow solids to be removed from the plant. The operator indicated that this will be repaired or replaced in the near future.
 - The facility has experienced problems with the clogging of the pumps in the flow equalization tank.
4. The previous inspection identified problems associated with the car washing activities at the track. Up to 20 cars per day were being washed in an area where the runoff drained to Clear Fork Mohican River. This practice is illegal since it results in the discharge of detergents, oils, grease and grit to waters of the state without an NPDES permit. The operations manager was not available at the time of the inspection so I would anticipate that a follow-up site visit will be conducted to evaluate modifications taken to mitigate impacts from car washing activities.
5. A review of effluent flow values showed high flows from 74,000 – 219,000 gpd. The plant operator indicated that these reading were not accurate and he estimated that the peak daily flows were around 16,000 gpd. Please review and improve the reporting and recordkeeping associated with the effluent flow values prior to the formal submittal of eDMR data. Reporting erroneously high flow values can result in effluent loading violations.

Sapp, Mike

From: Dave Schwall <dschwall@midohio.com>
Sent: Saturday, May 19, 2012 9:30 AM
To: Sapp, Mike
Subject: mid ohio

Mike

I left you a message from your call. Unfortunately your message was cut off during the part about car washing. If we need to speak about this over the phone feel free to give me a call on my cell, 419-564-4082.

The flow issues from 3-3-12 to 3-5-12 have been revised on the report. They should have been 7400 gallon a day not 74,000.

After reviewing the discrepancies from 2010 the problem was similar with a misplaced decimal. I am certain that the flows would have been 2,190 gallons on 4-13-10, 2,050 on 4-10-10 through 4-12-10. On 8-6-10 and 8-7-10 we did have a two day spike of 26,000 gallons. the following three days were 13,000 gallons on average. The 26,000 gallon days would have been over the Indy car weekend which is our biggest weekend of the year and I believe at that time the porta pot guys were dumping in as well. by comparison the same time period in 2011 showed a spike of 17,000 gallons for one day with the rest of the days being in the 10,000-12,000 range.

I hope this information helps.

Larry also mentioned that you were not receiving explanations when a violation occurred, I believe that I had sent those to you via email, if you need them in a different format let me know so I can remedy that as well.

Please let me know what else we may need to do to keep everything running smoothly.

My apologies again for missing the inspection, unfortunately my day was rearranged at the last minute.

Regards,
dave

dave schwall
operations manager
mid ohio sports car course
419*884*4578*direct dial phone
419*564*4082*cell
419*884*0568*fax
"living twitter free"

MID-OHIO SPORTS CAR COURSE 2012 MID-OHIO 800-MID-OHIO

 GRAND PRIX of Cleveland JUNE 8-10	 MID-OHIO SUPERBIKE FESTIVAL JUNE 22-24	 MID-OHIO SUPERBIKE FESTIVAL JULY 13-15	 MID-OHIO SUPERBIKE FESTIVAL JULY 20-22	 HONDA INDY 200 AUGUST 3-5	 HONDA INDY 200 SEPT 7-9
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HONDA
HOME OF THE MID-OHIO SCHOOL
OFFICIAL VEHICLE OF
MID-OHIO SPORTS CAR COURSE
AND THE MID-OHIO SCHOOL