



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

November 6, 2012

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

NOTICE OF VIOLATION

CERTIFIED MAIL

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, OJH 44145-5634

Dear Mr. Plummer:

On November 5, 2012, 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) during the inspection and Roger Osburn represented Lewis Wastewater Management, your contract operator. 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 7, 2011. The facility was notified of significant noncompliance in a letter dated September 20, 2012.

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, then a sampling tank prior to the final outfall. The plant was upgraded to a hydraulic capacity of 12,000 gpd.

Observations and Notations

Package Treatment Plant – Outfall 001

1. 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. The package plant receives sanitary wastes from restrooms, showers, and restaurants, as well as the laundry.
2. The plant is operated by Mr. Roger Osburn of Clean Streams/Lewis Wastewater Management on behalf of TA in conjunction with Mr. Corbin. Clean Streams collects samples, performs laboratory analyses, and electronically submits the data to the electronic discharge monitoring report (eDMR) system.
3. Log books, and a copy of NPDES permit, and the operation and maintenance manual are maintained at the site and were available for inspection. The log book was generally compliant with OAC 3745-7-09, except information collected by Mr. Corbin was collected on loose-leaf sheets instead of recorded in the bound log book. Mr. Corbin indicated he would get his record sheets bound. A copy of the contract was not available, and both Mr. Osburn and Mr. Corbin indicated that although requested there is currently no written contract with Lewis Wastewater Services/Clean Streams. **A copy of the operator contract must be available for inspection.**
4. Grease traps are pumped monthly. The trash trap was pumped six weeks ago. Sludge was removed from the facility approximately three weeks ago.
5. 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.
6. The content of the aeration tank had a good air and mixing. The tank color was noted as a dark brown. Sludge returns were a dark brown color, with slight foaming.
7. The surface of the clarifier was clear, and the skimmer appeared to be operating as designed. Effluent channels and clarifier sidewalls were reasonably clean.
8. The up-flow clarifier appears to be working as designed.
9. The dosing pumps and alarms for the surface sand filters were cycled and found in operating condition.

10. The plant was discharging to the south sand filter during the inspection. The south sand filter was noted as containing erosion rills and contained a minimal amount of leaf litter. The north sand filter was clean and reasonably level. Sand was replaced in the filters in 2011. A new distribution box was installed in 2011. The sand in the sand beds must be leveled as needed, or minimally once per week. Additional sand may be needed to bring the sand level even with the splash pads.
11. The ultraviolet disinfection system was not operating, as it was outside of the disinfection season of May through October.
12. The final effluent at Outfall 001 was observed as discharging an effluent of acceptable visual quality.

Storm Water System – Outfall 002

13. The OWS system appears in proper working order. Oil and grease are removed approximately every two months.
14. 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.
15. Permit 3IN00307 does not contain storm water language (Parts 4, 5, and 6) or require a storm water pollution prevention plan (SWPPP). We discussed this with TA in 2011 and Ohio EPA will likely have these requirements when this permit is renewed.
16. No evidence of discharges was noted from the roll-off box storage area.
17. 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

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2011 through October 1, 2012 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	00530	Total Suspended Solids	30D Conc	9.91	28.	11/1/2011
001	00530	Total Suspended Solids	7D Conc	14.97	28.	11/1/2011
001	00530	Total Suspended Solids	30D Qty	0.45	.52884	11/1/2011
001	00530	Total Suspended Solids	30D Conc	9.91	20.	12/1/2011
001	00530	Total Suspended Solids	7D Conc	14.97	20.	12/1/2011
001	00530	Total Suspended Solids	30D Qty	0.45	.49205	12/1/2011
001	00530	Total Suspended Solids	30D Conc	9.91	19.	1/1/2012
001	00530	Total Suspended Solids	7D Conc	14.97	19.	1/1/2012
001	00530	Total Suspended Solids	30D Qty	0.45	2.704	1/1/2012

001	00530	Total Suspended Solids	7D Qty	0.68	2.704	1/1/2012
001	00530	Total Suspended Solids	30D Conc	9.91	24.	2/1/2012
001	00530	Total Suspended Solids	7D Conc	14.97	24.	2/1/2012
001	00530	Total Suspended Solids	30D Qty	0.45	5.84646	2/1/2012
001	00530	Total Suspended Solids	7D Qty	0.68	5.84646	2/1/2012
001	80082	CBOD 5 day	30D Qty	0.38	.48721	2/1/2012
001	00530	Total Suspended Solids	30D Conc	9.91	23.	3/1/2012
001	00530	Total Suspended Solids	30D Qty	0.45	3.9523	3/1/2012
001	80082	CBOD 5 day	30D Qty	0.38	.8592	3/1/2012
001	00530	Total Suspended Solids	7D Conc	14.97	23.	3/22/2012
001	00530	Total Suspended Solids	7D Qty	0.68	3.9523	3/22/2012
001	80082	CBOD 5 day	7D Qty	0.57	8592	3/22/2012
001	00530	Total Suspended Solids	30D Qty	0.45	.60333	4/1/2012
001	00530	Total Suspended Solids	30D Conc	9.91	10.	5/1/2012
001	00530	Total Suspended Solids	30D Qty	0.45	1.09879	5/1/2012
001	00530	Total Suspended Solids	7D Qty	0.68	1.09879	5/1/2012
001	00530	Total Suspended Solids	30D Qty	0.45	.77702	6/1/2012
001	00530	Total Suspended Solids	7D Qty	0.68	.77702	6/8/2012
001	00530	Total Suspended Solids	30D Conc	9.91	11.	7/1/2012

Part III, Item 12 of your NPDES permit requires that a written explanation as to why these events occurred must be provided, along with measures to ensure that it is not repeated. In your January 6, 2012 response to the 2011 compliance inspection, you indicated that you would be submitting all noncompliance notifications. Ohio EPA received a response dated September 25, 2012 regarding the suspended solids violations following Ohio EPA's September 20, 2012 significant noncompliance notification. As no violations have occurred since your September 25, 2012, no additional information is required to respond to these violations at this time. The source of the suspended solids violation appears to have been a leaking joint in the clarifier, which was repaired in October 2012. For future reference, noncompliance notifications must be made within 24 hours of discovery. Noncompliance notification forms may be found at epa.ohio.gov/portals/35/permits/24-hour-reporting-Form4498-bypasses.doc. I shared a copy of the noncompliance notification requirements with your contract operator during the inspection.

Reporting Violations

No reporting code violations were noted for the reporting period reviewed.

Compliance Schedule Violations

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

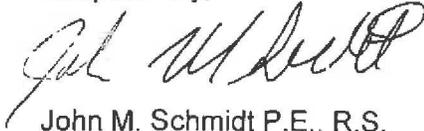
NPDES Permit Renewal

Please note that your current NPDES permit will expire on September 30, 2013. Part III of your NPDES permit requires that a renewal application be submitted to Ohio EPA at least 180 days prior to the expiration of your current permit (March 30, 2013).

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/cs

Dustin Lewis, Lewis Wastewater Management
 Roger Osburn

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

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature X <i>Joseph V Devita</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; background-color: #e0f0ff;"> <p>Mr. David A Plummer Travel Centers of America - Kingsville Travel Center No. 29 24601 Center Ridge Road Westlake, OH 44145-5634</p> </div>	<p>B. Received by (Printed Name) <i>JOSEPH V DEVITA</i> C. Date of Delivery <i>11/9/12</i></p>
<p>2. Article Number (Transfer from service label) <i>7012101000094675618</i></p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes if YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-94-1540</p>	

