



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

RE: **Notice of Violation**
Allen County
Pilot Travel Center #457
NPDES Permit

December 7, 2012

Mr. Joey Cupp
Environmental Manager
Pilot Travel Centers, LLC
5508 Lonas Road
Knoxville, Tennessee 37939

Dear Mr. Cupp:

We are in receipt of your self-monitoring reports covering the months of July through September 2012 for the above referenced facility. Our review indicates violations of the conditions of your National Pollutant Discharge Elimination System (NPDES) permit. The specific instances of non-compliance are enclosed on a separate sheet. Further review of your self-monitoring reports for the previous six months, ending in September 2012, indicates that you are in significant non-compliance (SNC) with an effluent limitation contained in your NPDES permit. The specific instance of SNC is enclosed on a separate sheet.

A facility becomes in SNC when it exceeds an effluent limit for four or more months in two consecutive quarters or exceeds an effluent limit significantly in any two months in two consecutive quarters. Achieving compliance with Ohio's environmental laws is a primary focus of Ohio EPA in order to reduce risks to public health and welfare.

Mr. Chris O'Neil indicated in his November 9, 2012, letter that an ongoing diesel fuel corrective action is taking place under the Bureau of Underground Storage Tank Regulations (BUSTR). The diesel fuel release occurred in July 2009. It is indicated in the letter that the corrective actions include monthly free product monitoring, and recovery and maintenance of several booms around the inlets and outlet of the environmental control pond.

Even though the facility is conducting ongoing corrective actions for the diesel fuel spill, it is apparent since the facility is now in SNC that additional and/or more frequent monitoring and maintenance of the environmental control pond and its outlet structure are needed to maintain compliance with the facility's NPDES permit. **Within 21 days** of the date of this letter, please submit, in writing, the actions that you propose to undertake in order to return your facility to and maintain ongoing compliance with your NPDES permit. These actions may also be submitted by email to me at Justin.Williams@epa.state.oh.us.

Mr. Joey Cupp
December 7, 2012
Page Two

If we do not receive your timely response or if your response does not adequately address the violations enclosed with this letter, the Director of Ohio EPA will likely take an enforcement action against you to bring these facilities into compliance with Ohio law.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. Information about Ohio EPA's Office of Compliance Assistance & Pollution Prevention can be found on Ohio EPA's website at <http://epa.ohio.gov/ocapp> or by calling (614) 644 – 3469.

If you wish to meet with our office to discuss this matter, please contact me at (419) 373 – 3022 **within 10 days** of receiving this letter in order to set up a meeting.

Sincerely,


Justin A. Williams
Environmental Specialist II
Division of Surface Water

/jlm

Enclosures

pc: Mr. Chris O'Neil, Pangean-CMD Associates, Inc.

ec: Tracking

Get New Data

Violations for Pilot Travel Center # 457 - July-September 2012

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2IN00221*AD	August 2012	001	00552	Oil and Grease, Hexane	1D Conc	10.0	19.	8/7/2012
2IN00221*AD	August 2012	601	00400	pH	1D Conc	6.5	6.42	8/7/2012
2IN00221*AD	September 2012	001	00552	Oil and Grease, Hexane	1D Conc	10.0	33.	9/6/2012

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2IN00221*AD	August 2012	001	00045	Total Precipitation			AB	8/5/2012
2IN00221*AD	August 2012	001	00045	Total Precipitation			AB	8/6/2012

Get New
Data

Get Detail
for Selected
Permit

Facilities in Significant Non-Compliance **

Period: Apr-12 Sep-12

County	Permit #	Facility Name	Major	Station Code	Param Code	Parameter Name	Max % Exceed	# Months Signif Exceed (1)**	# Months Exceed (2)**
Allen	2IN00221	Pilot Travel Centers LLC No 457		1	00552	Oil and Grease, Hexane Exl	230	2	2

Footnotes

for Significant NonCompliance

** Significant non-compliance with effluent limits occurred if one or more pollutants met the following conditions:

1. During 2 or more months, the reported effluent concentration (or computed load) for a parameter exceeded an effluent limit by:
 - a. 40% for Group 1 pollutants **plus Fecal Coliform**
 - b. 20% for Group 2 pollutants **plus pH, Temperature, whole effluent toxicity**-- or --
2. During 4 or more months, the reported concentration (or computed load) exceeded the limit by > 1%.

Note: This method differs from USEPA Significant Non-compliance (SNC) method in the following ways:

- USEPA only evaluates SNC for average limits. In above analyses, maximum and weekly limits were also considered.