Environmental Protection Agency

Governor
Lt. Governor
Director

December 8, 2011

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 7, 2011, 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 I spoke briefly 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 December 21, 2010.

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.

Plant Sanitary Waste Water Treatment

Plant sanitary wastes are discharged to 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). Therefore sanitary discharges from both the Pilot Travel Center and the adjacent Subway Restaurant are not a part of this NPDES permit.

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Observations and Notations

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.

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 drain cleanouts.

3. The OWS system appears in proper working order. 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 the summer of 2011.

4. The design flow of the wastewater treatment system is approximately 144,000 gpd (200 gpm). The flow is dependent upon precipitation events.

5. The ECP was observed to contain cattails, phragmites, and other vegetative growth throughout, with a ponding of turbid water in the center. The ECP was also accumulating a significant amount of solid waste, and truckers paring along the ECP appear to be dumping trash into the ECP. 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.

6. 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 on December 30, 2010. The latest annual site certification inspection was conducted on January 11, 2011. Ohio EPA could locate no documents on annual training on the SWPPP.

7. No evidence of discharges was noted from the roll-off box storage area.

8. Outfall 001 was found to be discharging an acceptable visual quality effluent.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2010 through November 1, 2011, indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit and Reporting Violations

No limit or reporting violations were noted for the period reviewed.

Other NPDES Permit Violations

1. Failure to Maintain an Engineered Component: From observations of the ECP, it appears that this pond may be 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.

2. Accumulation of Solid Waste in the ECP: Ohio EPA noted a significant accumulation of solid waste in the ECP. Please note that if solid waste is found in the ECP again, the water within the ECP will have to be managed as leachate (water in contact with solid waste under OAC 3745-27-01(L), which includes removing all liquids in the ECP and hauling to a municipal wastewater treatment facility.

3. Training on the SWPPP: During the inspection, Ohio EPA could locate no records of training of employees on the SWPPP. Part IV, Item D(7)(b)(9) requires training as specified in the plan, but no less frequent than annually.

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:bo

File: Industrial/Pilot Travel Centers No. 002 (Austinburg)/PC