

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

December 8, 2011

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

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, OH 44145-5634

Dear Mr. Plummer:

On December 7, 2011, 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. 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 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. The plant was upgraded to a hydraulic capacity of 12,000 gpd.

Observations and Notations

Package Treatment Plant – Outfall 001

1. A log book was available for inspection, but a copy of the contract was not available. Per discussions with your operator on December 5, 2011, at our office, a new log book will be installed at this location shortly, as well as a copy of the contract between TA and Clean Streams.
2. 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 plans receives sanitary wastes from restrooms, showers, and restaurants, as well as the laundry.
3. Mr. Corbin noted that sludge is periodically removed from the sludge holding tanks. This information must be noted in the log books, including the date and volume of sludge removed. Same notations are required for cleaning of the grease traps.
4. 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.
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. A significant amount of foaming was noted in the equalization basin.
6. The content of the aeration tank had a good color and mixing. Sludge returns were a medium brown color, with moderate foaming. The source of the excessive foaming is likely a phosphate source. The restaurants and laundry facilities should be examined for recent changes in phosphates and surfactants and low foaming and low phosphate cleaners should be substituted.
7. The surface of the clarifier was clear, and the skimmer appeared to be operating as designed. Effluent channels and clarifier sidewalls appear to have been recently cleaned.
8. The dosing pumps for the slow surface sand filters were cycled and found in operating condition. The alarm was found not operating and needs to be repaired as soon as possible.
9. The plant was discharging to the north sand filter during the inspection. The sand filter was noted as flooded and slowly draining. Mr. Corbin noted that the sand is scheduled to be replaced in both sand filters in 2011. The distribution box was replaced in 2011.
10. The ultraviolet disinfection system was not operating, as it was outside of the disinfection season of May through October.
11. The final effluent at Outfall 001 was observed as discharging an effluent of acceptable visual quality.

Storm Water System – Outfall 002

12. The OWS system appears in proper working order. Oil and grease are removed approximately every two months

13. 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.
14. Permit 3IN00307 does not contain storm water language (Parts 4, 5, and 6) or require a storm water pollution prevention plan (SWPPP). We discussed the fact that TA will likely have these requirements when this permit is renewed.
15. No evidence of discharges was noted from the roll-off box storage area.
16. The final effluent at Outfall 002 was observed of satisfactory visual quality. The final discharge at the unnamed tributary was observed as clear.
17. Mr. Corbin noted that the truck stop periodically loses power due to its location on the electrical grid, and that loss of power trips breakers in the WWTP that result in the WWTP being without operating blowers for extended periods of time until he can check the plant. TA must revise its operating procedures so that TA staff is required to notify Mr. Corbin and/or Clean Streams to check the plant when the power fails at this facility.

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 Violations

The following limit violations were noted for the period reviewed:

Station	Reportin g Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	9.91	10.	11/1/2010
001	00530	Total Suspended Solids	30D Conc	9.91	10.	12/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Conc	2.42	5.04	12/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.12018	12/1/2010
001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.74	5.04	12/8/2010
002	00550	Oil and Grease, Total	1D Conc	10	16.	2/23/2011
001	00530	Total Suspended Solids	30D Conc	9.91	10.	6/1/2011
001	00530	Total Suspended Solids	30D Conc	9.91	10.	7/1/2011
002	00400	pH	1D Conc	6.5	6.	7/21/2011
002	00550	Oil and Grease, Total	1D Conc	10	4124.	8/18/2011
001	00530	Total Suspended Solids	30D Conc	9.91	25.	9/1/2011
001	00530	Total Suspended Solids	30D Qty	0.45	.47786	9/1/2011
001	00530	Total Suspended Solids	7D Conc	14.97	25.	9/8/2011
001	00530	Total Suspended Solids	30D Conc	9.91	11.	10/1/2011

Mr. David A. Plummer, TA Operating LLC
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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. If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA, DSW, central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

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.

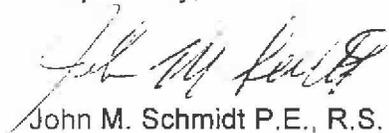
Other Violations

Maintain and Operate the WWTP (Power Failure) – Pursuant to Part III, Item 3 of your NPDES permit the plant shall be maintained at all times to ensure compliance with its NPDES permit. Ohio EPA understands that rural areas are often the first areas to lose power and often are the last to see power restored. From discussions with TA personnel (Observation 17 above), provisions for standby power must be provided. TA must provide documentation through a contract with its operator or others that in the event of a future power outage at this facility, that an emergency generator will be provided with sufficient capacity to operate the blowers and pumps within four hours of a power failure. Please provide documentation of these activities.

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

pc: Dustin Lewis, Lewis Wastewater Management

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