



January 15, 2020

Ms. Jessica Murphy, Manager Compliance & Enforcement Unit
Department of Environment and Conservation, Division of Water Resources
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Ave., 11th Floor
Nashville, TN 37243

TN Dept. of Env. & Conservation
JAN 16 2020
Division of Water Resources

RE: Director's Order WPC19-0131
Pilot Travel Centers LLC
Pilot Travel Center #270, Knox County, TN

Pilot Travel Centers LLC (Pilot) has prepared the following written response to the Director's Order WPC19-0131 dated January 9, 2020 for the above referenced facility.

Non-Compliance Items:

On August 1, 2018, the division issued a National Pollutant Discharge Elimination System (NPDES) permit TN0064556 authorizing discharge of treated bay-wash wastewater from Outfall 001 and storm water runoff from Outfall SW2. On October 15, 2019, the Division issued a Notice of Violation (NOV) for effluent exceedances at Outfall 001 and SW2 for Oil & Grease and E. Coli during the monitoring period of May 2019-August 2019 and noted a failure to sample for E. Coli at Outfall 001 for the July 2019 monitoring period. A response was submitted on November 18, 2019. During the May 2019- August 2019 monitoring period the following violations were cited on the Discharge Monitoring Reports (DMR):

- 3 Oil & Grease (O&G) exceedances of Outfall 001. The permitted limit for O&G is a daily maximum of 15 mg/L. The reported results are as follows:
 - A daily maximum of 24.1 mg/l for May 2019
 - A daily maximum of 26.1 mg/l for July 2019
 - A daily maximum of 22.8 mg/l for August 2019
- 2 E. coli exceedances of Outfall 001. The permitted limit for E.coli is a geometric mean of 126 CFU/100mL. The reported results are as follows:
 - Concentration of 280 cfu/100 ml for May 2019
 - Concentration of 1,201 cfu/100 ml for August 2019
- 1 E. coli exceedances of Outfall SW2-B. The permitted limit for E.coli is a daily maximum of 941 CFU/100mL. The reported result was as follows:
 - A daily maximum of 4,500 cfu/100 ml
- 1 E. coli non-receipt of Outfall 001 for July 2019.

Actions Taken or Planned:

In order to address the O&G and E. coli exceedances noted above, the following corrective and maintenance actions have been performed to date.

1. The Oil Water Separator (OWS) is monitored on a monthly basis. The level in each chamber is measured and the measurements are entered into an online database. The OWS is serviced as needed from the measurement tracking. There were no indications of any problems with the OWS during the May, July or August measurements. The OWS was serviced on July 12, 2019. 800 gallons of oil, grit, sediment and water were pumped out of the entry and separation chambers as a corrective action to address the oil & grease exceedances.
2. Corrective action taken to address the E.coli exceedances are weekly beneficial microbe E.coli reduction treatment on the OWS.
3. The E.coli non-receipt was sampler error. The E.coli sample was collected but lost by the sampler during transit and shipping. The error was discovered after the monitoring period had ended. To ensure this error is not repeated, all samples collected and analyzed each month are followed up on as soon as possible and any sampling and analysis issues will be addressed.

Actions Taken or Planned:

- There have been no exceedances of Outfall 001 in September, October, November or December 2019. The January sample has been collected but results have not been received.
- The July-December 2019 monitoring period for Outfall SWB-2 that has been submitted for the January 15, 2020 DMR due date, will exceed the daily maximum permit limit. Following the first sample exceedance an E. coli reduction treatment using beneficial microbes was performed. A follow up sample was collected later in December and the concentration was <1 cfu/100ml.
- Pilot will do an OWS and diesel drain clean out and line jetting. The interior of the OWS will be hot pressure washed and vacuumed out and will refill with fresh water.
- Within ninety (90) days, Pilot will submit a written corrective action plan to bring the facility into compliance.
- Civil Penalty: Pilot respectively proposes a reduced upfront penalty amount of \$2,300 based on the corrective actions taken to date. The amount of the civil penalty shall be tendered by Pilot to the Division on or before January 31, 2020.

I appreciate the opportunity to discuss these items with you and I look forward to your thoughts on this response. If you have any questions or require additional information please contact me at Joey.Cupp@pilottravelcenters.com or 865-474-2826.

Sincerely,
Pilot Travel Centers LLC



Joey Cupp
Director Environmental
Pilot Flying J

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