



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1600 John F. Kennedy Blvd.
Philadelphia, Pennsylvania 19103-2029**

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 06/07/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Site/Facility Name: Pilot Travel Center (#243 Location)
Permittee(s): Pilot Travel Centers LLC
Site/Facility Operator: Pilot Travel Centers LLC
Facility Address: 4304 First Ave. Nitro, WV 25143
Latitude: 38.4436 **Longitude:** -81.8308
County/Parish: Putnam
Permit Number: WVG611568
NAICS Code: 447190 **SIC:** 5541
Unique Project #: 3E23WN099A

Site/Facility Representative(s): **Point of Contact**

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Unique Project#: 3E23WN099A

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List of Attachments

- Attachment 1: Pilot Travel Centers, LLC Photo Log
- Attachment 2: PTC-243 Site Plan
- Attachment 3: WVPDES Permit No. WVG611568
- Attachment 4: Quarterly Visual Inspections Dec. 2022 – May 2023
- Attachment 5: PTC-243 SPCC 2022_Mar.final
- Attachment 6: PTC-243 OWS service history
- Attachment 7: PTC-243 Quarters Dec_2022-Feb_2023andMar_2023-May_2023-Exceedance report and Lab Reports
- Attachment 8: Class C Operator Certification
- Attachment 9: Annual SWPPP and GPP training records
- Attachment 10: Class C Operator Training Slides
- Attachment 11: Pilot 243 Bypass Records 2020 – 2021
- Attachment 12: PTC-243 GPP-SWPP 2017_Oct final
- Attachment 13: PTC-243 SW-Inspections

I. Introduction

On June 7, 2023, an inspection team comprised of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted an Industrial Stormwater Inspection of the Pilot Travel Center #243, Nitro facility (hereinafter, the “Facility”). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the West Virginia Pollutant Discharge Elimination System (WVPDES) Multi-Sector General Water Pollution Control Permit No. WVG611568 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the Facility at 1:00 PM for the inspection. Inspectors met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Edward Simas	EPA	(215) 814-2120	Simas.Edward@epa.gov
Michael Greenwald	EPA	(215) 814-2098	Greenwald.Michael@epa.gov
Site/Facility Representatives			
Mike Chapman	Sr. Environmental PMP	(865) 253-5766	Mike.chapman@pilottravelcenters.com
State or County Representatives			
Samantha Blair	WVDEP	(304) 281-6702	Samantha.n.blair@wv.gov
Ryan Harbison	WVDEP	(304) 767-4247	Ryan.T.Harbison@wv.gov
Nicholas Lyons	WVDEP	(681) 340-3989	Nicholas.A.Lyons@wv.gov

Edward Simas and Michael Greenwald displayed their credentials to Facility representatives at the Pilot Travel Centers, LLC convenience store (“Store” on Site Plan), and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Attachment 3. The EPA Inspection Team informed Facility Representatives that any information that is deemed to be confidential business information (“CBI”) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA’s CBI procedures.

B. Weather and Precipitation Conditions

During the inspection, weather was sunny and warm. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2 below: (T = trace value)

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches)
Saint Albans, WV	6/2/23	0.0
Saint Albans, WV	6/3/23	0.0
Saint Albans, WV	6/4/23	T
Saint Albans, WV	6/5/23	0.0
Saint Albans, WV	6/6/23	0.0
Saint Albans, WV	6/7/23	T

C. Summary of the Facility

Pilot Travel Centers, LLC also known as “Pilot Flying J” is a travel center facility with over 750 locations offering truck stop services, supplying gas and diesel fuel, and an attached convenience store. This report will focus on the Pilot Travel Center #243, hereinafter “Facility” store located in Nitro, WV. This Facility employs 15 employees with three different shifts. The corporate headquarters of Pilot Travel Centers, LLC is located in Knoxville, TN.

II. Facility Activity

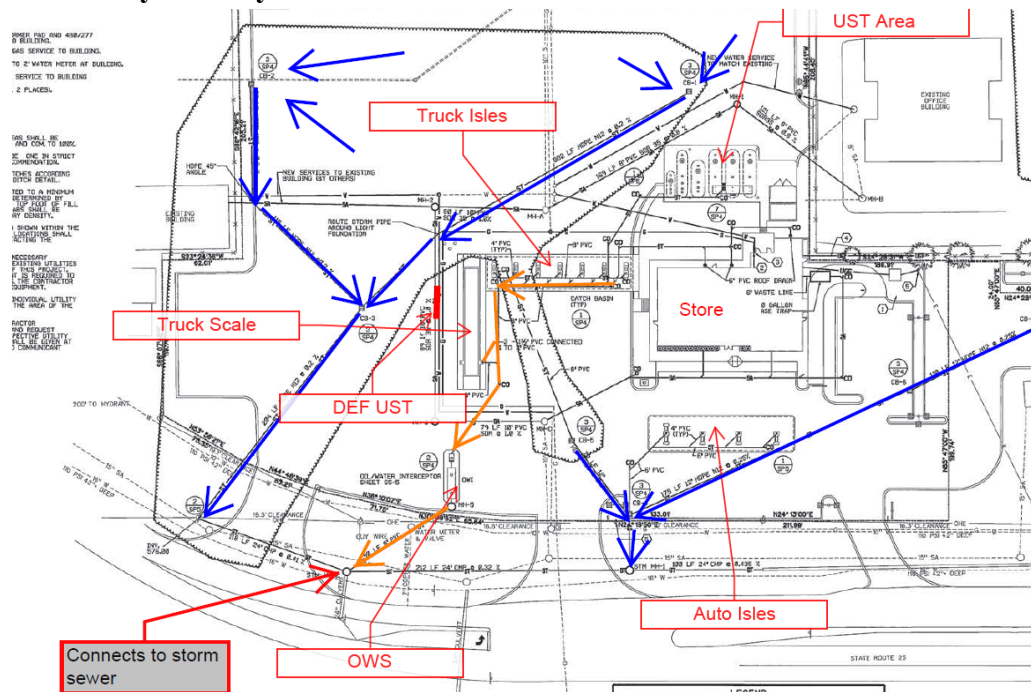


Figure 1- Site Plan

During the inspection, the EPA Inspection Team observed the following locations provided in the Facility Site Plan, hereinafter “Site Plan” (Attachment 2). Figure 1 provides a snapshot of the map. The inspection focus areas included: the underground storage tank area (“UST Area” on Site Plan), Truck fueling area (“Truck Isles” on Site Plan), automobile fueling area (“Auto Isles” on Site Plan), and surrounding outdoor storage areas. Additionally, the EPA Inspection Team visited each catch basin on the Site Plan evaluating stormwater conveyances. The Site Plan has a path of flow outlining where flow will discharge through oil-water separators (orange arrows) and where stormwater will be conveyed (blue arrows). The EPA Inspection Team also visited the NPDES Outlet 001 sampling area.

Facility representatives mentioned during the opening conference that the bulk of fuel spills in the past have occurred due to a tight turning angle in the Truck Isle area. Facility representatives estimated that an average of about two to three fuel pumps were hit by trucks per month as a result. The Facility recently underwent a traffic project to fix this turning angle issue.

WVDEP Bypass records are provided in Attachment 11. The Facility hires contractors to perform truck maintenance and pump out the oil-water separators on site.

The EPA Inspection Team asked the Facility about their spill procedure. Facility representatives responded that spill kits are stored adjacent to the store in an enclosed shed. Diapers and absorbents are removed from this shed as needed. the Facility mentioned that they cannot keep the spill kits outside near the fueling areas due to people tampering with the kits.

The EPA Inspection Team’s focus was to review the areas and operations related to industrial activity and stormwater runoff. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Michael Greenwald, and are provided in Attachment 1, Spirit Services Photo Log.

III. Observations

Underground Storage Tank Area (Refer to Attachment 1, photos DSCN3719 – DSCN3722)

The EPA Inspection Team began at the underground storage tank (“UST”) area to the north of the store adjacent to the existing office building noted on the Site Plan.

Observation #1: The EPA Inspection Team walked through the UST area and viewed the offloading area where tanker trucks will fill the UST’s (DSCN3720 – DSCN3721). Dark staining was observed in multiple areas. Facility representatives mentioned that the trench drains in the area are connected to oil-water separators. The Site Plan did not label this area as connecting to the oil-water separator route (orange arrows).

Outdoor Storage (Refer to Attachment 1, photos DSCN3723 – DSCN3736)

Section 5 of the Permit states, “Good Housekeeping requires the maintenance of a clean, orderly facility.”

The Facility had several outdoor storage areas that included a connex box, shed, and a non-hazardous waste disposal area. The shed stores many of the absorbents and diapers to clean spills (DSCN3727). Facility representative mentioned that the connex box stores miscellaneous items for the convenience store.

Observation #2: The EPA Inspection Team noticed staining in a few areas (DSCN3724 – DSCN3725). Additionally, there were two black trash cans filled with a murky dark liquid and solid waste contained within them. It was unclear where this waste resulted from, but both containers were uncovered (DSCN3728 – DSCN3729).

Facility Site Plan & Catch Basin Walk Through (Refer to Attachment 1, photos DSCN3737 - DSCN3755)

Paragraph 19, Section A of the Permit states, “1. A site map indicating, each drainage and discharge structure; an outline of the drainage area of each discharge point, each past or present area used for outdoor storage or disposal of significant materials; each existing structural control measure to reduce pollutants in stormwater runoff; materials loading and access area; each hazardous waste storage or disposal facility (including each area not required to have a Resource Conservation and Recovery Act (RCRA) permit which is used for accumulating hazardous waste under 40 CFR Part 262.34); each well where fluids from the facility are injected underground; sinkholes; springs; and other surface water bodies;”

The EPA Inspection Team traced the flow of stormwater discharge by how it is mapped out on the Facility Site Plan (Attachment 2). The EPA Inspection began at “CB-1” (Catch Basin 1) and walked the perimeter of the Facility confirming the locations of each basin. The blue arrows on the Site Plan depict stormwater conveyances and the orange arrows depict flow through the oil-water separators.

Observation #3: Each catch basin appeared to have drain filter inserts in place that extended out at the borders of each inlet. Facility Representative mentioned the inserts are changed quarterly or as needed. The Facility provided recent stormwater inspections that also document any stormwater management actions taken, such as sock change outs (Attachment 4). Additionally, the EPA Inspection Team observed an open manhole on the west corner of the lot in the grass area. It is unclear as to the type of conveyance that this manhole leads to, however the Site Plan indicates that this area is nearest to the stormwater conveyance route. At the time of inspection, the manhole was covered with a black temporary black plastic

covering (DSCN3748). Facility representatives stated this manhole is not used for sampling and that sampling occurs after flow enters the last oil-water separator in the Truck Isles (DSCN3749 – DSCN3750). There was no NPDES sample marker in this area and it is unclear which manhole the Facility utilizes for sampling. The Site Plan indicates that the area may be at “MH-5” which appears to be the final flow through the Oil-Water separator before connecting to the storm sewer conveyance. The NPDES Outlet sampling point is not marked on the Site Plan nor physically on site.

Benchmark Exceedances & Facility Exceedance Report (Refer to Attachment 7)

Section B.6 of the Permit states, “Most monitoring in this permit is benchmark monitoring. The "benchmarks" are the pollutant concentrations above which The Director determined represents a level of concern. The level of concern is a concentration at which a stormwater discharge could potentially impair or contribute to impairing water quality or affect human health from ingestion of water or fish. The benchmarks are also viewed by the DWWM as a level, that if below, a facility represents little potential for water quality concern. As such, the benchmarks also provide an appropriate level to determine whether a facility's stormwater pollution prevention measures are successfully implemented.”

“The SWPPP must be modified after the average of two consecutive samples are above the benchmark level for the sampled parameter. Based upon the modification of this plan, the selection, design, installation and implementation of any control measures at the facility may be required to ensure that all sampled parameters meet the required benchmark levels.”

Observation #4: The EPA Inspection Team reviewed the Enforcement Compliance History Online (ECHO) data report for the Facility, and it revealed that the Facility had a total of **28** benchmark exceedances from the monitoring period end date of 6/30/2019 – 3/31/2023. These benchmark exceedances are available to view below in Table 3. The Facility provided to EPA the most recent two quarters of benchmark exceedance reports in Attachment 7 documenting ammonia, BOD, and COD discharge monitoring report exceedances. A few of the potential causes documented on the benchmark exceedance report included livestock trailers, transient wildlife, and walking pets on the premise. Additionally, Facility representatives stated that diesel exhaust fluid (DEF) is an additive for the diesel that contains urea and may be another potential source resulting in the ammonia exceedances. A solution for the exceedances does not appear to be documented on the exceedance report. Facility representatives did mention that a traffic project was made fairly recently to mitigate trucks hitting pumps causing an increase of spills each month. Bypass records are provided in Attachment 11 documenting trucks hitting the dispensers. There was no evidence that the SWPPP was modified after two consecutive samples were above the benchmark level for ammonia nitrogen (exceeded each quarter from 12/31/2020 through 3/31/2023), COD (exceeded 3/30/2021 and 6/30/2021), and BOD (5-day) (exceeded 3/30/2021 and 6/30/2021, as well as 12/31/2021 and 3/31/2022).

Table 3. Benchmark Exceedances 06/30/2019 – 03/31/2023

NPDES Outlet No.	Parameter	Monitoring Period End Date	Benchmark Limit (mg/L)	DMR Reported Value (mg/L)
1	BOD, 5-day, 20 deg. C	3/31/2023	30	45.4
1	Nitrogen, ammonia total [as N]	3/31/2023	4	289
1	Chemical Oxygen Demand [COD]	3/31/2023	120	132
1	BOD, 5-day, 20 deg. C	12/31/2022	30	42.8
1	Nitrogen, ammonia total [as N]	12/31/2022	4	69.3
1	Nitrogen, ammonia total [as N]	9/30/2022	4	42
1	Nitrogen, ammonia total [as N]	6/30/2022	4	37.5
1	Nitrogen, ammonia total [as N]	3/31/2022	4	23
1	BOD, 5-day, 20 deg. C	12/31/2021	30	58.3
1	Nitrogen, ammonia total [as N]	12/31/2021	4	7.53
1	Nitrogen, ammonia total [as N]	9/30/2021	4	24.5
1	BOD, 5-day, 20 deg. C	6/30/2021	30	107
1	Nitrogen, ammonia total [as N]	6/30/2021	4	94.7
1	Chemical Oxygen Demand [COD]	6/30/2021	120	173
1	BOD, 5-day, 20 deg. C	3/31/2021	30	190
1	Nitrogen, ammonia total [as N]	3/31/2021	4	41.4
1	Chemical Oxygen Demand [COD]	3/31/2021	120	227
1	Nitrogen, ammonia total [as N]	12/31/2020	4	30.6
1	BOD, 5-day, 20 deg. C	9/30/2020	30	132
1	Oil and grease, hexane extr method	9/30/2020	15	18.4
1	Nitrogen, ammonia total [as N]	9/30/2020	4	316
1	Chemical Oxygen Demand [COD]	9/30/2020	120	297
1	BOD, 5-day, 20 deg. C	12/31/2019	30	261
1	Oil and grease, hexane extr method	12/31/2019	15	15.4
1	Nitrogen, ammonia total [as N]	12/31/2019	4	175
1	Chemical Oxygen Demand [COD]	12/31/2019	120	486

1	BOD, 5-day, 20 deg. C	6/30/2019	30	131
1	Nitrogen, ammonia total [as N]	6/30/2019	4	69.8

Employee Training & Visual Inspections (Refer to Attachment 8 – Attachment 10)

Section A.2 of the Permit states, “Employee Training - Employee training programs that inform personnel at all levels of responsibility of the components and goals of the SWPPP shall be conducted annually. Training shall address topics such as spill response, good housekeeping, and material management practices. Records of the training programs performed (including date, topics, attendees, etc.) shall be maintained in the SWPPP.”

Section A.2 of the Permit states, “Visual Inspections - Qualified company personnel shall be identified to inspect designated equipment and plant or other appropriate areas for quarterly visual inspections. Material handling areas shall be inspected for evidence of, or the potential for, pollutants entering the drainage system. A tracking and follow-up program shall be developed to ensure that adequate response and corrective actions have been taken in response to observations/findings during the inspection. Records of inspections and any corrective actions taken shall be maintained in the SWPPP.”

Observation #5: The EPA Inspection Team requested records of annual SWPPP (Stormwater Pollution Prevention Plan) and GPP (Groundwater Protection Plan) training. Facility Representatives provided Attachments 8 – 10 that certify that each operator is “Class C” certified and is required to take the training curriculum in Attachment 10. Facility Representatives confirmed that it is done annually and provided an attached log of the current year and previous years (Attachment 9).

Facility Representatives provided Attachment 4 documenting two recent quarterly visual monitoring reports.

SWPPP and GPP (Stormwater Pollution Prevention Plan and Groundwater Protection Plan) Requirements

Section B. 19 of the Permit requires that, “Each facility covered by this permit shall develop and implement a SWPPP and a GPP. Both the SWPPP and GPP must be developed and maintained as separate stand-alone documents. The SWPPP shall be prepared in accordance with good engineering practices. The SWPPP shall identify potential sources of pollution which may reasonably be expected to affect the quality of stormwater discharges associated with industrial activity from the facility. In addition, the SWPPP shall describe the implementation of practices which are to be used to reduce the pollutants in stormwater discharges associated with industrial activity at the facility and to assure compliance with the terms and conditions of this permit.”

Observation #6: Facility representatives provided an SPCC plan (Spill Prevention, Control, and Countermeasure Plan) updated in March 2022 and a combined SPPCC and GPP from October 2017.

IV. Records Review (*Refer to Attachment 1, photos DSCN3713 – DSCN3717*)

During the opening conference, the EPA Inspection Team reviewed the cover of the SPCC plan and GPP, Underground Storage Tank (UST) training records, and the sample material safety data sheets (MSDS) for the types of fuel the Facility supplies. After the inspection, the Facility also provided the PTC-243 Site Plan, Quarterly Visual Inspections Dec. 2022 – May 2023, the SPCC plan and GPP, OWS (oil-water separator) service history, benchmark exceedances reports, and employee training records.

V. Closing Conference

After the Facility walk through, the EPA Inspection Team met with the Facility representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the Facility. The EPA Inspection Team reiterated to the Facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at 2:35PM.