

OHIO E.P.A.

AUG 11 2006

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

ENTERED DIRECTOR'S JOURNAL

In the Matter of:

Ohio Department of Transportation
1980 West Broad Street
Columbus, Ohio 43223

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Director's Final Findings
and Orders

Respondent

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to the Ohio Department of Transportation ("Respondent"), pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 6111.03 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and are binding upon Respondent and successors in interest liable under Ohio law.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 6111 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

Rest Areas 1-25 and 1-26, I-75 Northbound and Southbound

1. Respondent owns and operates wastewater treatment plants at Rest Areas 1-25 and 1-26, located both northbound and southbound, respectively, on I-75 in

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.
Dir. J. J. [Signature] Date 8-11-06

Hancock County, Ohio. Respondent's NPDES permit (No. 2PP00019*CD, eff. April 1, 2001) for the 1-25 and 1-26 Rest Areas expired on March 30, 2006.

2. The 1-25 and 1-26 Rest Area wastewater treatment plants discharge to Tiderishi Creek. Tiderishi Creek is defined as "waters of the state" pursuant to ORC Section 6111.01.
3. Ohio EPA inspected Rest Areas 1-25 and 1-26 on October 12, 2005. Ohio EPA observed at the northbound plant that the dosing pumps had failed for the wastewater treatment plant and that the plant was generally in poor condition. The southbound plant's sand filter was also flooded. Operation and maintenance records requested at the time of the inspection were not provided, as required by Part III of the NPDES permit.
4. Additionally, Ohio EPA noted that Respondent was currently in violation of the NPDES permit schedule of compliance for failing to submit a Permit to Install (PTI) application for dechlorination facilities by October 1, 2001.
5. Ohio EPA inspected the I-25 northbound Rest Area again on October 18, 2005. At that time, the Rest Area restroom facilities were not in operation and portable latrines had been placed at the rest area. An inspection of the wastewater treatment plant revealed that the plant had no air filter, the dosing station was out of operation and the sand filters were loaded with sludge. There was also evidence that the sand filters had been overflowing with partially treated sewage eventually discharging to a nearby drainage ditch.
6. Ohio EPA conducted a compliance inspection at the 1-25 and I-26 Rest Areas on January 13, 2005. Ohio EPA observed that one of the sand beds at each plant had flooded and weeds were observed in the other beds. Dead animals were also observed floating in both the northbound and southbound plants' chlorine contact tanks. Additionally, a PTI had still not been submitted for the installation of dechlorination units as required by the NPDES permit compliance schedule.
7. Part III, Section 3(A), of NPDES Permit No. 2PP00019*CD, requires that Respondent operate its wastewater treatment works at all times in good working order and in a way necessary to achieve compliance with the terms of the permit. Based on the conditions observed in Findings 5 and 6, Respondent violated Part III, Section 3(A) of its permit.
8. On several days between August 2004 and August 2005, Respondent violated the permit effluent limits for the 1-25 and 1-26 Rest Areas. (See Attachment A.)
9. Plant upgrades were completed by Respondent as of Feb. 17, 2006, and a PTI to install a dechlorination unit for the 1-25 and 1-26 Rest Areas was submitted Feb. 2, 2006. During an inspection conducted on March 30, 2006, Ohio EPA observed that dechlorination units were installed and the sand filters had been cleaned and

the sand had been replaced.

Rest Area 1-29, US 23 Southbound near Carey

10. Respondent owns and operates a wastewater treatment plant at Rest Area 1-29, located on U.S. 23, southbound, in Wyandot County, Ohio. Respondent holds a valid NPDES permit (No. 2PP00020*DD) for the I-29 Rest Area. The wastewater treatment plant for the I-29 Rest Area discharges to Little Tymochtee Creek. Little Tymochtee Creek is defined as "waters of the state" pursuant to ORC Section 6111.01.
11. Ohio EPA inspected the I-29 Rest Area on October 18, 2005. At that time, the Rest Area restroom facilities were not in operation and portable latrines had been placed at the Rest Area. An inspection of the wastewater treatment plant revealed that only one pump had been installed in the filter dosing station, and sand had been removed from the west filter and had been dumped back into the filter without leveling. There was also evidence that the filters had been overflowing with wastewater to a nearby catch basin, and eventually discharging to a roadside ditch along U.S. 23.
12. Part III, Section 3(A), of NPDES Permit No. 2PP00020*DD, requires that Respondent operate its wastewater treatment works at all times in good working order and in a way necessary to achieve compliance with the terms of the permit. Based on the conditions observed in Finding 11, Respondent violated Part III, Section 3(A) of its permit.
13. In violation of NPDES Permit No. 2PP00020*DD, Part II, Item K, Respondent also failed to submit a copy of an Annual Sludge Report summarizing the sludge disposal and/or reuse activities during the previous year due on January 31, 2006.
14. On several days between August 2004 and August 2005, Respondent violated the permit effluent limits for the 1-29 Rest Area. (See Attachment B.)

Rest Area 1-30, US 23 Northbound near Carey

15. Respondent owns and operates a wastewater treatment plant at Rest Area 1-30, located on U.S. 23, northbound, in Wyandot County, Ohio. Respondent holds a valid NPDES permit (No. 2PP00021*DD) for the I-30 Rest Area. The wastewater treatment plant for the I-30 Rest Area discharges to Tymochtee Creek. Tymochtee Creek is defined as "waters of the state" pursuant to ORC Section 6111.01.
16. Ohio EPA inspected the I-30 Rest Area on October 18, 2005. At that time, the Rest Area restroom facilities were not in operation and portable latrines had been placed at the Rest Area. During the inspection, Ohio EPA noted that the sand filters were ponding and had been overflowing to the east to a large wet area that extended

onto adjacent property. Both filters also had thick blankets of sludge under standing water.

17. Part III, Section 3(A), of NPDES Permit No. 2PP00021*DD, requires that Respondent operate its wastewater treatment works at all times in good working order and in a way necessary to achieve compliance with the terms of the permit. Based on the conditions observed in Finding 16, Respondent violated Part III, Section 3(A) of its permit.
18. In violation of NPDES Permit No. 2PP00021*DD, Part II, Item K, Respondent also failed to submit a copy of an Annual Sludge Report summarizing the sludge disposal and/or reuse activities during the previous year due on January 31, 2006.
19. On several days between August 2004 and August 2005, Respondent violated the permit effluent limits for the 1-30 Rest Area. (See Attachment C.)

Rest Area No. 1-27, US 30 Eastbound, 3.2 miles east of SR 49

20. Respondent owns and operates a wastewater treatment plant at Rest Area 1-27, located on U.S. 30, eastbound, 3.2 miles east of SR 49, Van Wert County, Ohio. Respondent holds a valid NPDES permit (No. 2PP00035*CD) for the I-27 Rest Area. The wastewater treatment plant for the I-27 Rest Area discharges to Monkey Run. Monkey Run is defined as "waters of the state" pursuant to ORC Section 6111.01.
21. Ohio EPA inspected the I-27 Rest Area on October 18, 2005. At that time, the Rest Area restroom facilities were not in operation and portable latrines had been placed at the Rest Area. During the inspection, Ohio EPA noted that the plant's raw sewage pump had recently failed with a subsequent overflow of untreated wastewater onto the ground. Furthermore, the south sand filter was flooded and it appeared that ponded water had recently been pumped off the north filter. Wastewater overflows from the plant had left a trail of sludge deposits in the mowed grass area to the north and also in the roadside ditch along U.S. 30 eastbound.
22. Part III, Section 3(A), of NPDES Permit No. 2PP00035*CD, requires that Respondent operate its wastewater treatment works at all times in good working order and in a way necessary to achieve compliance with the terms of the permit. Based on the conditions observed in Finding 21, Respondent violated Part III, Section 3(A) of its permit.
23. Respondent failed to submit a copy of an Annual Sludge Report summarizing the sludge disposal and/or reuse activities during the previous year due on January 31, 2006, required per NPDES Permit No. 2PP00035*CD, Part II, Item J (p. 7).

Rest Area No. 7-25, I-75 Northbound 3 miles north of exit 111 at Wapakoneta

24. Respondent owns and operates a wastewater treatment plant at Rest Area 7-25, located on I-75, northbound, approximately 3 miles north of exit 111 at Wapakoneta, Auglaize County, Ohio. Respondent holds a valid NPDES permit (No. 2PP00024*DD) for the 7-25 Rest Area. The wastewater treatment plant for the 7-25 Rest Area discharges to an unnamed tributary of the Auglaize River. The Auglaize River is defined as "waters of the state" pursuant to ORC Section 6111.01.
25. On several days between August 2004 and July 2005, Respondent violated the permit effluent limits for the 7-25 Rest Area. (See Attachment D.)

Rest Area No. 7-26, I-75 Southbound 3 miles north of exit 111 at Wapakoneta

26. Respondent owns and operates a wastewater treatment plant at Rest Area 7-26, located on I-75, southbound, approximately 3 miles north of exit 111 at Wapakoneta, Auglaize County, Ohio. Respondent holds a valid NPDES permit (No. 2PP00025*DD) for the 7-26 Rest Area. The wastewater treatment plant for the 7-26 Rest Area discharges to the Auglaize River.
27. On several days between August 2004 and August 2005, Respondent violated the permit effluent limits for the 7-26 Rest Area. (See Attachment E.)

Rest Area No. 7-33, US 33 Eastbound 2 miles east of SR 66

28. Respondent owns and operates a wastewater treatment plant at Rest Area 7-33, located on U.S. 33, eastbound, approximately 2 miles east of State Route 66, Auglaize County, Ohio. Respondent holds a valid NPDES permit (No. 2PP00026*DD) for the 7-33 Rest Area. The wastewater treatment plant for the 7-33 Rest Area discharges to the St. Marys River. The St. Marys River is defined as "waters of the state" pursuant to ORC Section 6111.01.
29. On several days between August 2004 and September 2005, Respondent violated the permit effluent limits for the 7-33 Rest Area. (See Attachment F.)

Safety Rest Area OTT-2-16.65 Westbound, SR 2, 3 miles NW of Port Clinton

30. Respondent owns and operates a wastewater treatment plant at Safety Rest Area OTT-2-16.65, located at the State Route 2 rest area, westbound, approximately 3 miles northwest of Port Clinton, Ottawa County, Ohio. Respondent holds a valid NPDES permit (No. 2PP00044*BD) for the OTT-2-16.65 Rest Area. The wastewater treatment plant for the OTT-2-16.65 Rest Area discharges to La Carpe Creek. La Carpe Creek is defined as "waters of the state" pursuant to ORC Section 6111.01.
31. On several days between August 2004 and August 2005, Respondent violated the

permit effluent limits for Safety Rest Area OTT-2-16.65. (See Attachment G.)

32. In violation of NPDES Permit No. 2PP00044*BD, Respondent also failed to submit a copy of an Annual Sludge Report summarizing the sludge disposal and/or reuse activities during the previous year due on January 31, 2006.

Rest Area at US Route 30 Eastbound, Upper Sandusky

33. Respondent owns and operates a wastewater treatment plant at the US Route 30 Rest Area, located at U.S. Route 30 East, Upper Sandusky, in Wyandot County, Ohio. Respondent holds a valid NPDES permit (No. 2PP00048*AD) for the U.S. Route 30 Rest Area. The wastewater treatment plant for the US Route 30 Rest Area discharges to Broken Sword Creek. Broken Sword Creek is defined as "waters of the state" pursuant to ORC Section 6111.01.
 34. On several days between August 2004 and August 2005, Respondent violated the permit effluent limits for for the US Route 30 Rest Area. (See Attachment H.)
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35. A Facility Management quality assurance review (QAR) report issued by Respondent in both 2002 and 2004 indicated that the wastewater treatment plants at the 1-25, 1-26, 1-29 and 1-30 Rest Areas had been in poor condition since at least 2002 and that immediate steps needed to be taken to fix the problems at each Rest Area. A summary of the findings in both the 2002 and 2004 QARs indicated that the majority of conditions observed in 2005 were present in 2002, including 1) inoperable motor/blow assemblies, 2) missing air filters on the blowers or filters in need of cleaning, 3) electrical components in need of repair, 4) activated sludge and skimmer lines were not operating properly, 5) surface sand filters either had weeds, ponded water and/or overflowing sludge, and 6) chlorine contact tanks were not being maintained or properly filled with tablets. Despite these reports, the conditions at these Rest Areas continued to deteriorate through 2005.
 36. Pursuant to ORC § 6111.04(A), no person shall cause pollution or place or cause to be placed any sewage, sludge, sludge materials, industrial waste, or other wastes in a location where they cause pollution of any waters of the state.
 37. Pursuant to ORC § 6111.04(C), no person to whom a permit has been issued shall place or discharge, or cause to be placed or discharged, in any waters of the state any sewage, sludge, sludge materials, industrial waste, or other wastes in excess of the permissive discharges specified under an existing permit.
 38. Pursuant to ORC § 6111.07(A), no person shall violate or fail to perform any duty imposed by ORC §§ 6111.01 to 6111.08 or violate any order, rule, or term or condition of a permit issued or adopted by the Director of Ohio EPA pursuant to

those sections. Each day of violation is a separate offense.

39. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of ORC § 6111.

V. ORDERS

Rest Area No. 1-26, I-75 Northbound and Southbound Rest Areas

1. Respondent shall immediately attain compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
2. Within fifteen (15) days, Respondent shall submit a NPDES permit renewal application for the 1-25 and 1-26 Rest Areas.

Rest Area 1-29, US 23 Southbound near Carey

3. Respondent shall immediately attain compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
4. Within fifteen (15) days, Respondent shall submit an NPDES permit renewal application for the 1-29 Rest Area.
5. Within thirty (30) days after the effective date of these Orders, Respondent shall submit to Ohio EPA the Respondent's 2005 Annual Sludge Report. This Annual Report shall be submitted in accordance with Section X of these Orders.
6. Within ninety (90) days from the effective date of these Orders, Respondent shall make all necessary temporary upgrades to the wastewater treatment plant for the 1-29 Rest Area, including, but not limited to, replacing all necessary plumbing, filters, motors, electrical boxes, and sand filter media.
7. Within one-hundred eight (180) days, Respondent shall submit a permit to install (PTI) for the installation of a replacement wastewater treatment system at the 1-29 Rest Area. Upon approval of the PTI, Respondent shall immediately install the new system.

Rest Area 1-30, US 23 Northbound near Carey

8. Respondent shall immediately attain compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
9. Within fifteen (15) days, Respondent shall submit an NPDES permit renewal application for the 1-30 Rest Area.
10. Within thirty (30) days after the effective date of these Orders, Respondent shall submit to Ohio EPA the Respondent's 2005 Annual Sludge Report. This Annual Report shall be submitted in accordance with Section X of these Orders.
11. Within ninety (90) days from the effective date of these Orders, Respondent shall make all necessary temporary upgrades to the wastewater treatment plant for the 1-30 Rest Area, including, but not limited to, replacing all necessary plumbing, filters, motors, electrical boxes, and sand filter media.
12. Within one-hundred eighty (180) days, Respondent shall submit a permit to install (PTI) for the installation of a replacement wastewater treatment system at the 1-30 Rest Area. Upon approval of the PTI, Respondent shall immediately install the new system.

Rest Area No. 1-27, US 30 Eastbound, 3.2 miles east of SR 49

13. Respondent shall immediately attain compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
14. Within thirty (30) days after the effective date of these Orders, Respondent shall submit a permit to install (PTI) for the installation of a dechlorination unit for the 1-27 Rest Area. Upon approval of the PTI, Respondent shall immediately install the dechlorination unit.
15. Within thirty (30) days after the effective date of these Orders, Respondent shall submit to Ohio EPA the Respondent's 2005 Annual Sludge Report. This Annual Report shall be submitted in accordance with Section X of these Orders.
16. Within ninety (90) days from the effective date of these Orders, Respondent shall make all necessary upgrades to the wastewater treatment plant for the 1-27 Rest Area, including, but not limited to, replacing all necessary plumbing, filters, motors, electrical boxes, and sand filter media.

Rest Area No. 7-25, I-75 Northbound 3 miles north of exit 111 at Wapakoneta

17. Respondent shall immediately attain compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
18. Within thirty (30) days, Respondent shall submit a permit to install (PTI) for the installation of a dechlorination unit for the 7-25 Rest Area. Upon approval of the PTI, Respondent shall immediately install the dechlorination unit.

Rest Area No. 7-26, I-75 Southbound 3 miles north of exit 111 at Wapakoneta

19. Respondent shall immediately attain compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
20. Within thirty (30) days, Respondent shall submit a permit to install (PTI) for the installation of a dechlorination unit for the 7-26 Rest Area. Upon approval of the PTI, Respondent shall immediately install the dechlorination unit.

Rest Area No. 7-33, US 33 Eastbound 2 miles east of SR 66

21. Respondent shall immediately compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
22. Within thirty (30) days, Respondent shall submit a permit to install (PTI) for the installation of a dechlorination unit for the 7-33 Rest Area. Upon approval of the PTI, Respondent shall immediately install the dechlorination unit.

Safety Rest Area OTT-2-16.65 Westbound, SR 2, 3 miles NW of Port Clinton

23. Respondent shall immediately attain compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
24. Within thirty (30) days after the effective date of these Orders, Respondent shall submit to Ohio EPA the Respondent's 2005 Annual Sludge Report. This Annual Report shall be submitted in accordance with Section X of these Orders.
25. Respondent shall abandon the OTT-2.16.65 Rest Area wastewater treatment plant and connect to public sewers when the public sewers become available (estimated to be complete by October 2006.)

Rest Area at US Route 30 Eastbound, Upper Sandusky

26. Respondent shall immediately attain compliance with the final effluent limits of its NPDES permit and properly operate and maintain the wastewater treatment plant.
27. Respondent shall hire at least one operator in responsible charge of the wastewater treatment systems with at least a Class I operator's license. The operator in responsible charge shall make at least three non-consecutive visits per week for at least 30 minutes to each Rest Area named in these orders.
28. Respondent shall hire at least one additional licensed operator with at least a Class I operator's license to assist the operator in responsible charge. This licensed operator shall make daily visits to each Rest Area named in these orders to maintain proper operation.
29. Respondent shall pay to the Ohio EPA the amount of one hundred fifty thousand dollars (\$150,000.00) in settlement of the Ohio EPA's claim for civil penalties, which may be assessed pursuant to ORC § 6111. Payment shall be made by tendering an official check made payable to "Treasurer, State of Ohio" for \$90,000.00 within thirty (30) days of the effective date of these Orders, to the following address: Ohio EPA, Office of Fiscal Administration, P.O. Box 1049, Columbus, Ohio 43216-1049, together with a letter identifying Respondent and the sites.

A photocopy of the check shall be sent to Ohio EPA, Northwest District Office, in accordance with Section X of these Orders.

30. In lieu of paying the remaining \$60,000.00 dollars of the civil penalty, Respondent shall within thirty (30) days of the effective date of these Orders, fund a Supplemental Environmental Project ("SEP") by making a contribution in that amount to the Ohio EPA's Automotive Mercury Switch Program (Fund 5DW). Respondent shall tender an official check made payable to "Treasurer, State of Ohio" for that amount. The official check shall be submitted to Brenda Case, or her successor, together with a letter identifying the Respondent, to:

Ohio EPA
Office of Fiscal Administration
P.O. Box 1049
Columbus, Ohio 43216-1049

A copy of each check shall be sent to Mark Mann, Environmental Manager, Stormwater and Enforcement Sections, or his successor, at the following address:

Ohio EPA
Division of Surface Water
P.O. Box 1049
Columbus, OH 43216 -1049

31. Should Respondent fail to fund the SEP within the required timeframe set forth in Order No. 30, Respondent shall immediately pay to Ohio EPA the full amount of the civil penalty in accordance with the procedures in Order No. 29.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and Ohio EPA's Division of Surface Water acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to the Site.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency
Northwest District Office
Division of Surface Water
347 N. Dunbridge Road
Bowling Green, Ohio 43402
Attn: DSW Enforcement Coordinator

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity. Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative or a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these

Orders.

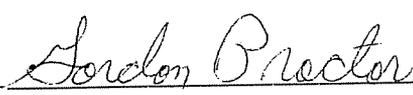
IT IS SO ORDERED AND AGREED:
Ohio Environmental Protection Agency



Joseph P. Koncelik
Director

8/9/06
Date

IT IS SO AGREED:
Ohio Department of Transportation



Signature

7-20-06
Date

Gordon Proctor
Printed or Typed Name

Director
Title

ATTACHMENT A

NPDES 2PP00019*CD
Rest Area No. 1-26, I-75 Northbound and Southbound Rest Areas
Effluent Limitation Violations

Parameter	Limit	Result	Date
Chlorine	0.019	0.54	8/11/2004
Dissolved Oxygen	6.0	4.2	8/11/2004
Nitrogen, Ammonia	2.3	5.77	8/11/2004
Nitrogen, Ammonia	1.5	5.77	8/11/2004
Total Suspended Solids	18	19.96	8/11/2004
Total Suspended Solids	12	19.96	8/11/2004
Chlorine	0.019	0.11	9/8/2004
Dissolved Oxygen	6.0	4.8	9/8/2004
Fecal Coliform	1000	15021	9/8/2004
Fecal Coliform	2000	15021	9/8/2004
Nitrogen, Ammonia	2.3	15.6	9/8/2004
Nitrogen, Ammonia	1.5	15.6	9/8/2004
Chlorine	0.019	0.04	10/13/2004
Dissolved Oxygen	6.0	7.8	10/13/2004
Fecal Coliform	1000	6852	10/13/2004
Fecal Coliform	2000	6852	10/13/2004
Dissolved Oxygen	6.0	4.1	11/10/2004
Dissolved Oxygen	6.0	3.7	12/8/2004
Dissolved Oxygen	6.0	3.8	1/12/2005
Nitrogen, Ammonia	4	20.59	1/12/2005
Nitrogen, Ammonia	6	20.59	1/12/2005
Dissolved Oxygen	6.0	3.8	2/8/2005
Dissolved Oxygen	6.0	3.9	3/9/2005
Nitrogen, Ammonia	4	28.45	3/9/2005
Nitrogen, Ammonia	6	28.45	3/9/2005
Dissolved Oxygen	6.0	3.0	4/20/2005
Nitrogen, Ammonia	4	15.988	4/20/2005
Nitrogen, Ammonia	6	15.98	4/20/2005

Parameter	Limit	Result	Date
Chlorine	0.019	0.54	5/11/2005
Dissolved Oxygen	6.0	1.2	5/11/2005
Fecal Coliform	1000	4444	5/11/2005
Fecal Coliform	2000	4444	5/11/2005
Nitrogen, Ammonia	2.3	19.6	5/11/2005
Nitrogen, Ammonia	1.5	19.6	5/11/2005
CBOD	10	10.8	6/8/2005
Chlorine	0.019	0.327	6/8/2005
Dissolved Oxygen	6.0	0.4	6/8/2005
Fecal Coliform	1000	36400	6/8/2005
Fecal Coliform	2000	36400	6/8/2005
Nitrogen, Ammonia	2.3	57.5	6/8/2005
Nitrogen, Ammonia	1.5	57.46	6/8/2005
Chlorine	0.019	0.47	7/13/2005
Dissolved Oxygen	6.0	0.4	7/13/2005
Fecal Coliform	1000	20000	7/13/2005
Fecal Coliform	2000	20000	7/13/2005
Nitrogen, Ammonia	2.3	60.6	7/13/2005
Nitrogen, Ammonia	1.5	60.6	7/13/2005
Total Suspended Solids	18	37	7/13/2005
Total Suspended Solids	12	37	7/13/2005
Chlorine	0.019	0.04	8/10/2005
Dissolved Oxygen	6.0	1.3	8/10/2005
Fecal Coliform	1000	60962	8/10/2005
Fecal Coliform	2000	60962	8/10/2005
Nitrogen, Ammonia	2.3	81.6	8/10/2005
Nitrogen, Ammonia	1.5	81.6	8/10/2005

ATTACHMENT B

NPDES 2PP00020*DD
Rest Area 1-29, US 23 Southbound near Carey
Effluent Limitation Violations

Parameter	Limit	Result	Date
Nitrogen, Ammonia	2	33.8	8/1/2004
Nitrogen, Ammonia	0.05	0.16631	8/1/2004
Fecal Coliform	1000	34000	8/1/2004
Nitrogen, Ammonia	3	33.8	8/22/2004
Nitrogen, Ammonia	0.08	0.16631	8/22/2004
Fecal Coliform	2000	34000	8/22/2004
Dissolved Oxygen	5.0	1.3	8/23/2004
CBOD	10	13.5	12/1/2004
Dissolved Oxygen	5.0	3.9	3/7/2005
Nitrogen, Ammonia	2	41.6	6/1/2005
Nitrogen, Ammonia	0.05	0.07873	6/1/2005
Fecal Coliform	1000	20000	6/1/2005
Dissolved Oxygen	5.0	2.1	6/22/2005
Nitrogen, Ammonia	3	41.6	6/22/2005
Fecal Coliform	2000	20000	6/22/2005
Chlorine	0.019	2	6/22/2005
Nitrogen, Ammonia	2	21.6	8/1/2005
Nitrogen, Ammonia	0.05	0.07358	8/1/2005
Nitrogen, Ammonia	3	21.6	8/22/2005
pH	6.5	2.8	8/23/2005
Chlorine	0.019	0.14	8/23/2005

ATTACHMENT C

NPDES 2PP00021*DD
Rest Area 1-30, US 23 Northbound near Carey
Effluent Limitation Violations

Parameter	Limit	Result	Date
Total Suspended Solids	12	40	8/1/2004
Total Suspended Solids	0.32	0.49962	8/1/2004
Nitrogen, Ammonia	2	105	8/1/2004
Nitrogen, Ammonia	0.05	1.3115	8/1/2004
Fecal Coliform	1000	42000	8/1/2004
Total Suspended Solids	18	40	8/22/2004
Total Suspended Solids	0.48	0.49962	8/22/2004
Nitrogen, Ammonia	3	105	8/22/2004
Nitrogen, Ammonia	0.08	1.3115	8/22/2004
Fecal Coliform	2000	42000	8/22/2004
Dissolved Oxygen	5.0	1.1	8/23/2004
Dissolved Oxygen	5.0	3.8	12/22/2004
Total Suspended Solids	12	65	3/1/2005
Total Suspended Solids	18	65	3/1/2005
Total Suspended Solids	0.32	0.41824	3/1/2005
CBOD	10	44.7	3/1/2005
CBOD	15	44.7	3/1/2005
Nitrogen, Ammonia	2	12.4	6/1/2005
Nitrogen, Ammonia	0.05	0.15019	6/1/2005
Fecal Coliform	1000	19000	6/1/2005
Dissolved Oxygen	5.0	2.7	6/22/2005
Nitrogen, Ammonia	3	12.4	6/22/2005
Nitrogen, Ammonia	0.08	0.15019	6/22/2005
Fecal Coliform	2000	19000	6/22/2005
Chlorine	0.019	1.1	6/22/2005
Nitrogen, Ammonia	2	4.95	8/1/2005
Fecal Coliform	1000	22000	8/1/2005
Nitrogen, Ammonia	3	4.95	8/22/2005
Fecal Coliform	2000	22000	8/22/2005
Dissolved Oxygen	5.0	2.7	8/23/2005

ATTACHMENT D

NPDES 2PP00024*DD

Rest Area No. 7-25, I-75 Northbound 3 miles north of exit 111 at Wapakoneta
Effluent Limitation Violations

Parameter	Limit	Result	Date
Fecal Coliform	1000	20000	8/1/2004
Dissolved Oxygen	5.0	4	8/4/2004
Fecal Coliform	2000	20000	8/22/2004
Dissolved Oxygen	5.0	3.04	8/24/2004
Chlorine	0.038	0.1	8/24/2004
Fecal Coliform	1000	1120	9/1/2004
Chlorine	0.038	0.3	9/7/2004
pH	6.5	6.38	9/22/2004
Chlorine	0.038	0.14	9/22/2004
Nitrogen, Ammonia	2.0	2.88	10/1/2004
Chlorine	0.038	0.15	10/5/2004
Dissolved Oxygen	5.0	2.56	10/20/2004
pH	6.5	6.26	10/20/2004
Dissolved Oxygen	5.0	4.7	10/27/2004
Dissolved Oxygen	5.0	3.06	11/23/2004
Dissolved Oxygen	5.0	4.9	11/30/2004
pH	6.5	5.7	12/6/2004
pH	6.5	5.55	12/21/2004
Dissolved Oxygen	5.0	4.62	1/26/2005
pH	6.5	6.25	3/29/2005
CBOD	10	15.48	4/1/2005
pH	6.5	6	4/6/2005
pH	6.5	6.4	4/13/2005
pH	6.5	6	4/20/2005
CBOD	15	15.48	4/22/2005
Dissolved Oxygen	5.0	4.27	4/27/2005
pH	6.5	6.2	4/27/2005
Nitrogen, Ammonia	2.0	7.63	5/1/2005
Nitrogen, Ammonia	0.08	0.08953	5/1/2005
Fecal Coliform	1000	2000	5/1/2005
Dissolved Oxygen	5.0	4.9	5/18/2005
Nitrogen, Ammonia	3.0	7.63	5/22/2005

Parameter	Limit	Result	Date
Fecal Coliform	2000	2000	5/22/2005
Dissolved Oxygen	5.0	3.85	5/24/2005
Chlorine	0.038	0.08	5/24/2005
Fecal Coliform	1000	1360	6/1/2005
pH	6.5	6.2	6/2/2005
pH	6.5	6.15	6/7/2005
pH	6.5	6.3	6/14/2005
Dissolved Oxygen	5.0	4.9	6/22/2005
pH	6.5	6.2	6/22/2005
Dissolved Oxygen	5.0	3.45	6/28/2005
pH	6.5	6.13	6/28/2005
Chlorine	0.038	0.08	6/28/2005
Fecal Coliform	1000	4800	7/1/2005
Dissolved Oxygen	5.0	4.2	7/6/2005
pH	6.5	6.1	7/6/2005
Dissolved Oxygen	5.0	4	7/12/2005
pH	6.5	6.3	7/12/2005
Dissolved Oxygen	5.0	3.2	7/21/2005
pH	6.5	6.2	7/21/2005
Fecal Coliform	2000	4800	7/22/2005
Dissolved Oxygen	5.0	1.9	7/26/2005
pH	6.5	6.15	7/26/2005
Chlorine	0.038	0.06	7/26/2005

ATTACHMENT E

NPDES 2PP00025*DD

Rest Area No. 7-26, I-75 Southbound 3 miles north of exit 111 at Wapakoneta
Effluent Limitation Violations

Parameter	Limit	Result	Date
Dissolved Oxygen	5.0	4.3	8/19/2004
Dissolved Oxygen	5.0	3.01	8/24/2004
Fecal Coliform	1000	1320	9/1/2004
Chlorine	0.038	0.2	9/9/2004
pH	6.5	6.43	9/22/2004
Chlorine	0.038	0.15	9/22/2004
Total Suspended Solids	12.0	56	10/1/2004
Total Suspended Solids	0.5	0.61468	10/1/2004
Nitrogen, Ammonia	2.0	20.16	10/1/2004
Nitrogen, Ammonia	0.08	0.22129	10/1/2004
Chlorine	0.038	0.2	10/5/2004
Total Suspended Solids	18.0	56	10/15/2004
Nitrogen, Ammonia	3.0	20.16	10/15/2004
Nitrogen, Ammonia	0.1	0.22129	10/15/2004
Dissolved Oxygen	5.0	3.31	10/20/2004
pH	6.5	5.82	10/20/2004
Dissolved Oxygen	5.0	3.81	11/23/2004
pH	6.5	6.42	11/23/2004
Dissolved Oxygen	5.0	4.75	11/29/2004
pH	6.5	6.1	12/8/2004
pH	6.5	5.37	12/21/2004
Dissolved Oxygen	5.0	4.71	2/24/2005
Dissolved Oxygen	5.0	4.33	3/29/2005
pH	6.5	6.3	3/29/2005
Dissolved Oxygen	5.0	3.77	4/27/2005
Nitrogen, Ammonia	2.0	4.13	5/1/2005
Fecal Coliform	1000	1100	5/1/2005
Nitrogen, Ammonia	3.0	4.13	5/22/2005
Dissolved Oxygen	5.0	3.99	5/24/2005
Chlorine	0.038	0.2	5/24/2005
pH	6.5	6.3	6/1/2005
Fecal Coliform	1000	11900	6/1/2005
pH	6.5	6.25	6/8/2005
pH	6.5	6.3	6/15/2005
pH	6.5	6.15	6/22/2005
Fecal Coliform	2000	11900	6/22/2005

Parameter	Limit	Result	Date
pH	6.5	6.13	6/28/2005
Chlorine	0.038	0.05	6/28/2005
Fecal Coliform	1000	9400	7/1/2005
pH	6.5	6.2	7/6/2005
pH	6.5	6	7/13/2005
pH	6.5	6.3	7/20/2005
Fecal Coliform	2000	9400	7/22/2005
pH	6.5	6.01	7/26/2005
Chlorine	0.038	0.07	7/26/2005
Nitrogen, Ammonia	2.0	27.09	8/1/2005
Nitrogen, Ammonia	0.08	0.29735	8/1/2005
Fecal Coliform	1000	20000	8/1/2005
Dissolved Oxygen	5.0	1	8/2/2005
Dissolved Oxygen	5.0	1.5	8/9/2005
Dissolved Oxygen	5.0	0.9	8/16/2005
Nitrogen, Ammonia	3.0	27.09	8/22/2005
Nitrogen, Ammonia	0.1	0.29735	8/22/2005
Fecal Coliform	2000	20000	8/22/2005
Dissolved Oxygen	5.0	0.85	8/24/2005
Chlorine	0.038	0.12	8/24/2005
Dissolved Oxygen	5.0	0.75	8/30/2005

ATTACHMENT F

NPDES 2PP00026*DD
Rest Area No. 7-33, US 33 Eastbound 2 miles east of SR 66
Effluent Limitation Violations

Parameter	Limit	Result	Date
pH	6.5	6.4	8/19/2004
Chlorine	0.038	0.18	8/24/2004
Nitrogen, Ammonia	2.0	18.97	9/1/2004
Nitrogen, Ammonia	0.08	0.17462	9/1/2004
Fecal Coliform	1000	31200	9/1/2004
CBOD 5 day	10	13.5	9/1/2004
Chlorine	0.038	0.3	9/8/2004
Dissolved Oxygen	5.0	3.2	9/15/2004
Dissolved Oxygen	5.0	1.09	9/22/2004
Nitrogen, Ammonia	3.0	18.97	9/22/2004
Nitrogen, Ammonia	0.10	0.17462	9/22/2004
Fecal Coliform	2000	31200	9/22/2004
Chlorine	0.038	0.26	9/22/2004
Nitrogen, Ammonia	2.0	5.81	10/1/2004
Fecal Coliform	1000	3600	10/1/2004
Chlorine	0.038	0.3	10/4/2004
Dissolved Oxygen	5.0	3.9	10/13/2004
pH	6.5	6.4	10/13/2004
Nitrogen, Ammonia	3.0	5.81	10/15/2004
Fecal Coliform	2000	3600	10/15/2004
Dissolved Oxygen	5.0	1.72	10/20/2004
pH	6.5	6.35	10/20/2004
Chlorine	0.038	0.06	10/20/2004
Dissolved Oxygen	5.0	3.6	10/27/2004
pH	6.5	6.4	11/30/2004
pH	6.5	6.47	12/21/2004
Nitrogen, Ammonia	2.0	2.2	5/1/2005
Fecal Coliform	1000	10200	5/1/2005
Fecal Coliform	2000	10200	5/22/2005
Dissolved Oxygen	5.0	4.25	5/24/2005
Chlorine	0.038	0.1	5/24/2005
Chlorine	0.038	0.05	6/28/2005

Parameter	Limit	Result	Date
Fecal Coliform	1000	21000	7/1/2005
pH	6.5	6.2	7/5/2005
Fecal Coliform	2000	21000	7/22/2005
Chlorine	0.038	0.08	7/26/2005
Chlorine	0.038	0.36	8/24/2005
Fecal Coliform	1000	20000	9/1/2005
Fecal Coliform	2000	20000	9/15/2005
Chlorine	0.038	0.07	9/21/2005

ATTACHMENT G

NPDES 2PP00044*AD and NPDES 2PP00044*BD
 Safety Rest Area OTT-2-16.65 Westbound, SR 2, 3 miles NW of Port Clinton
 Effluent Limitation Violations

Parameter	Limit	Result	Date
Nitrogen, Ammonia (NH3)	1.0	6.82	8/1/2004
Nitrogen, Ammonia (NH3)	0.02	0.09035	8/1/2004
Fecal Coliform	1000	1200	8/1/2004
Nitrogen, Ammonia (NH3)	1.5	6.82	8/8/2004
Nitrogen, Ammonia (NH3)	0.03	0.09035	8/8/2004
Nitrogen, Ammonia (NH3)	1.0	1.77	9/1/2004
Nitrogen, Ammonia (NH3)	1.5	1.77	9/8/2004
Nitrogen, Ammonia (NH3)	1.0	6.72	10/1/2004
Nitrogen, Ammonia (NH3)	1.5	6.72	10/1/2004
Nitrogen, Ammonia (NH3)	0.02	0.03815	10/1/2004
Nitrogen, Ammonia (NH3)	0.03	0.03815	10/1/2004
Fecal Coliform	1000	3300	10/1/2004
Fecal Coliform	2000	3300	10/1/2004
Nitrogen, Ammonia (NH3)	2	17.7	11/1/2004
Nitrogen, Ammonia (NH3)	3	17.7	11/1/2004
Nitrogen, Ammonia (NH3)	0.04	0.13399	11/1/2004
Nitrogen, Ammonia (NH3)	0.06	0.13399	11/1/2004
Nitrogen, Ammonia (NH3)	2	4.68	12/1/2004
Nitrogen, Ammonia (NH3)	3	4.68	12/1/2004
Total Suspended Solids	12	13	1/1/2006
Nitrogen, Ammonia (NH3)	2	8.54	1/1/2006
Nitrogen, Ammonia (NH3)	0.04	0.06465	1/1/2006
Nitrogen, Ammonia (NH3)	3	8.54	1/8/2006
Nitrogen, Ammonia (NH3)	0.06	0.06465	1/8/2006
Total Suspended Solids	12	16	2/1/2006
Nitrogen, Ammonia (NH3)	2.0	5.65	2/1/2006
Nitrogen, Ammonia (NH3)	3.0	5.65	2/8/2006

ATTACHMENT H

NPDES 2PP00048*AD
Rest Area at US Route 30 Eastbound, Upper Sandusky
Effluent Limitation Violations

Parameter	Limit	Result	Date
Nitrogen, Ammonia	3.0	3.145	2/1/2005
Nitrogen, Ammonia	4.5	5.7	2/8/2005
Total Suspended Solids	18	48	6/1/2005
Total Suspended Solids	12	21.4666	6/1/2005
Nitrogen, Ammonia	1.5	3.81	6/1/2005
Nitrogen, Ammonia	1.0	2.17	6/1/2005