Pennsylvania Department of Environmental Protection

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0080560**
Facility Type	**Storm Water**	APS ID	**1124102**
Major / Minor	**Minor**	Authorization ID	**1503600**

NPDES PERMIT FACT SHEET INDIVIDUAL INDUSTRIAL WASTE (IW) AND IW STORMWATER

Applicant and Facility Information

Applicant Name	**HPT-PSC Properties Trust**	Facility Name	**Harrisburg Travel Center**
Applicant Address	24601 Center Ridge Road	Facility Address	7848 Linglestown Road
	Westlake, OH 44145-5634		Harrisburg, PA 17112-9391
Applicant Contact	Clayton Barns	Facility Contact	Clayton Barns
Applicant Phone	(440) 808-4431	Facility Phone	(440) 808-4431
Client ID	262080	Site ID	452093
SIC Code	5399,5411,7538	Municipality	West Hanover Township
SIC Description	Retail Trade - Grocery Stores,Retail Trade - Miscellaneous General Merchandise Stores,Services - General Automotive Repair Shops	County	Dauphin
Date Application Received	October 15, 2024	EPA Waived?	Yes
Date Application Accepted	October 29, 2024	If No, Reason	

Purpose of Application: NPDES discharge of stormwater associated with industrial activity.

Summary of Review

This is a renewal application for a NPDES individual permit for discharges of stormwater and discharges from an oil/water separator located in West Hanover Township, Dauphin County. See Figures 1 and 2 for a Site Location Map and Site Plan.

Currently, the facility is covered under PA0080560, which expires on April 30, 2025. The permittee was previously listed as TA Operations LLC. The applicant requested that the permittee name be changed to HPT-PSC Properties Trust for this permit renewal. HPT-PSC Properties Trust is the owner of the facility and TA Operations LLC is the operator. Therefore, a transfer to change the permittee name to HPT-PSC Properties Trust has been incorporated with this renewal.

The facility does not have a SIC code that requires an NPDES permit for discharges of stormwater associated with industrial activity. A sewage treatment plant that served the truck stop was abandoned in 1996, and all sewage from the facility is now directed to the West Hanover municipal sewer system. After the treatment plant was abandoned, an oil/water separator was installed that receives a combination of paved area washdown water and stormwater from the truck fueling areas. Due to inadequate maintenance of the oil/water separator and numerous operations and maintenance related violations in the past, the facility obtained an individual NPDES industrial stormwater permit for frequent monitoring and inspection of the oil/water separator.

Due to past operations and maintenance violations, a consent order and agreement (COA) was executed between DEP and the permittee on November 26, 2012. Under the terms of the COA, the permittee paid a civil penalty for violations and installed a holding tank to collect washdown water and water from drains at the truck maintenance garage that previously drained to the oil/water separator. The permittee is required to carry out regular maintenance on the oil/water separator and pump it out regularly in conjunction with good housekeeping and best management practices.

Approve	Deny	Signatures	Date
X		*Jacob S. Rakowsky* Jacob S Rakowsky, E.I.T. / Project Manager	1/2/2025
X		*Scott M. Arwood* Scott M. Arwood, P.E. / Environmental Engineer Manager	1/2/2025

Summary of Review

The facility's primary SIC code is 7538 (general automotive repair shops). The facility has secondary SIC codes of 5411 (grocery stores), 5399 (general merchandise stores), and 7521 (automobile parking). The facility is currently used as a travel center and provides diesel refueling of trucks; maintenance and repair of trucks; a convenience store and restaurant; showers, laundry, and bathroom facilities; and a parking area for trucks and cars.

The facility has two outfalls: Outfall 001 and Outfall 002. Outfall 001 receives stormwater from a parking area and is listed as No Exposure in the application. Sampling is not required at Outfall 001. Outfall 002 receives combined discharges from the 10,000-gallon oil/water separator and stormwater from parking lot runoff. A discharge from the oil/water separator is rare. Stormwater from Outfall 002 discharges to a retention pond prior to entering a UNT to Manada Creek (WWF, MF). The sampling location for Outfall 002 has been established at the discharge from the storm sewer just upstream of the retention pond. However, pH and Oil and Grease samples shall be taken at the manhole immediately downstream of the oil/water separator.

A renewal application was received on 10/15/2024 via PUP 264697. The application was deemed complete on 10/29/2024. A technical deficiency notice was issued on 12/2/2024. The deficiencies were resolved on 12/23/2024. Revisions were received via email.

A Corrective Action Plan (CAP) for COD benchmark exceedances at Outfall 002 were also received via email and PUP 279302. The CAP proposes to clean out the catch basins upstream of Outfall 002 and then maintain them using catch basin insert filters. The catch basin insert maintenance will be added to the SPCC/PPC Plan.

Per the application, the PPC Plan was last updated in October 2023.

EPA waiver is in effect.

Part C permit conditions require semi-annual site inspections as well as implementation of BMPs and implementation of the facility PPC Plan. Given the BMPs in place, the discharge is not expected to have any measurable effect on the water quality of the receiving stream.

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	N/A (stormwater)
Latitude	40º 21' 14.56"	Longitude	-76º 43' 23.54"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Unnamed Tributary to Manada Creek (WWF, MF)	Stream Code	9588
NHD Com ID	56398869	RMI	0.52
Drainage Area	0.052 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.00027	Q_{7-10} Basis	StreamStats
Watershed No.	7-D	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	PATHOGENS		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	PA American Water Company		
PWS Waters	Manada Creek	Municipality	South Hanover Twp, Dauphin County
PWS RMI	0.53	Distance from Outfall (mi)	7

Other Comments:

Outfall 002 discharges to a retention basin just upstream of UNT Manada Creek (WWF, MF). The sampling location for Outfall 002 has been established at the discharge from the storm sewer just upstream of the retention pond. However, pH and Oil and Grease samples shall be taken at the manhole immediately downstream of the oil/water separator.

Drainage Area: 339,500 sq ft

% Impervious: 91

Description of Materials / Activities in Drainage Area Exposed to Precipitation: Diesel fueling pad, facility parking area, a roadway catch basin, a grass area catch basin.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater: 10,000-gal oil/water separator, “SNOUT” catch basin in the oil/debris/water separator, vegetative swale, infiltration pond.

Compliance History	
Summary of DMRs:	The facility was required to submit semiannual sampling results for pH, Oil and Grease, COD, TSS, cBOD5, TRPH, TKN, TP, and Total Iron under their previous permit. The facility is up to date with their eDMR submissions. eDMR sampling results can be found in Tables 1 and 2 below. The facility was required to submit E. Coli and Fecal Coliform impairment sampling results due to the pathogen impairment of the receiving water. The discharge is not expected to cause or contribute to the impairments.
Summary of Inspections:	The facility was last inspected on 1/14/2021. No violations were noted. The client currently has no open violations that should affect issuance of the final permit.

Table 1. eDMR Data for Outfall 002 (1/1/2022-12/23/2024)

Date DMR Received	Outfall*	cBOD5	COD (typ. BM 120)	Total Iron	TKN	TP	TRPH	TSS (typ. BM 100)	Oil and Grease (Inst. Max 30, Daily Max 15)	pH (Inst. Min 6.0, Inst. Max 9.0)
1/20/2023	002	37.80	**174**	1.47	14.40	0.37	9.30	38	No Discharge	No Discharge
2/27/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
3/27/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
4/17/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
5/8/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
6/12/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
6/26/2023	002	147.00	**627**	1.64	50.60	2.50	5.00	53	No Discharge	No Discharge
7/5/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
8/22/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
9/19/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
10/26/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
11/30/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge
12/20/2023	002	-	-	-	-	-	-	-	No Discharge	No Discharge

Table 1 continued. eDMR Data for Outfall 002 (1/1/2022-12/23/2024)

Date DMR Received	Outfall*	cBOD5	COD (typ. BM 120)	Total Iron	TKN	TP	TRPH	TSS (typ. BM 100)	Oil and Grease (Inst. Max 30, Daily Max 15)	pH (Inst. Min 6.0, Inst. Max 9.0)
1/4/2024	002	99.90	**211**	1.95	32.00	1.04	5.00	70	No Discharge	No Discharge
2/16/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge
3/26/2024	002	-	-	-	-	-	-	-	**103****	8.46
4/26/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge
5/28/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge
6/26/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge
7/18/2024	002	176.00	**413**	2.74	320.00	3.54	5.00	17	No Discharge	No Discharge
8/15/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge
9/13/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge
10/17/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge
11/20/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge
12/23/2024	002	-	-	-	-	-	-	-	No Discharge	No Discharge

***** 1. Sampling not required at Outfall 001, no exposure.
2. pH and Oil and Grease samples were taken at the manhole immediately downstream from the oil/water separator.
3. Samples for all other 1/6 month parameters were taken during a storm event at the discharge from the storm sewer draining to the retention pond.

****** 3/26/24 Non-Compliance Form, Oil and Grease Sample: Preservation for this analysis did not meet regulatory or method requirements; therefore, the sample was diluted and results are bias. Additionally, lab analysis was performed on aliquot of sample due to high solid content of the sample. There was sediment in water sample.

Table 2. Summary of eDMR Data for Outfall 002 (1/1/2022-12/23/2024)

	Avg.	Min.	Max.	Limit	Benchmark	# of Exceedances	# of Samples Reported
pH*	8.46	8.46	8.46	6.0 to 9.0	-	0	1
Oil & Grease*	**103.00**	103.00	**103.00**	30	-	1	1
COD	**356**	**174**	**627**	-	120	4	4
TSS	45	17	70	-	100	0	4
cBOD5	115.18	37.80	176.00	-	-	-	-
TRPH	6.08	5.00	9.30	-	-	-	-
TKN	104.3	14.4	320.0	-	-	-	-
TP	1.86	0.37	3.54	-	-	-	-
Total Iron	1.95	1.47	2.74	-	-	-	-

* pH and Oil & Grease average, min, and max were based off samples that were able to be obtained. Discharge was observed for 1 of the 25 sampling events from 1/1/22 to 12/23/24.

Summary of Sampling Results:

Values highlighted in red in Table 1 and Table 2 exceeded typical PAG-03 benchmarks or permit limits. The applicable PAG-03 benchmarks include: 120 mg/L for COD; 9.0 S.U. for pH; 100 mg/L for TSS; 30 mg/L for Oil and Grease. The limits from the previous permit include: pH instantaneous minimum and instantaneous maximum of 6.0 S.U. and 9.0 S.U., respectively; Oil and Grease average monthly of 15 mg/L and instantaneous maximum of 30 mg/L. Benchmarks were exceeded for COD for two or more consecutive monitoring periods at Outfall 002. As a result, a corrective action plan was submitted to DEP per Part C.V.F of your permit. The permittee plans to clean out the catch basins upstream of Outfall 002 and then maintain them using catch basin insert filters.

Proposed Effluent Limitations and Monitoring Requirements

All parameters from the previous permit will continue to be sampled at Outfall 002. Total Nitrogen monitoring will also be added to this permit, consistent with the monitoring requirements of a PAG-03.

Table 3. Proposed Monitoring Requirements for Outfall 002.

Parameter	Effluent Limitations				Monitoring Requirements (1),(2)	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	6.0	XXX	Report	9.0	2/month	Grab
Oil and Grease	XXX	15.0	Report	30.0	2/month	Grab
Total Nitrogen (mg/L) (3)	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Chemical Oxygen Demand	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids	XXX	XXX	Report	XXX	1/6 months	Grab
cBOD5	XXX	XXX	Report	XXX	1/6 months	Grab
TRPH	XXX	XXX	Report	XXX	1/6 months	Grab
Total Kjeldahl Nitrogen	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	Report	XXX	1/6 months	Grab

Footnotes

(1) In accordance with Part C V.C, the permittee shall conduct additional monitoring if specified by DEP in the letter authorizing permit coverage or other correspondence.
(2) This is the minimum number of sampling events required. Permittees may optionally perform additional sampling.
(3) Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO2+NO3-N), where TKN and NO2+NO3-N are measured in the same sample.

Benchmarks for TSS of 100 mg/L and COD of 120 mg/L are included, which is typical of the monitoring requirements for PAG-03 Appendices (effective 3/24/2023). Benchmarks for pH and Oil and Grease were not included since limits were assigned to them.
The BMPs from Appendix J are included.
Special Conditions related to the oil/water separator are included in Part C.II.H of the permit.
The requirement to submit an Annual Report is included.
The requirement for routine inspections on a semiannual basis is included.

Antidegradation (93.4):

The applicant is not proposing a new or increased discharge to a High Quality (HQ) or Exceptional Value (EV) water, so Module 1 (Anti Degradation Module) was not attached to the application.

The effluent limits for this discharge have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. Best Management Practices will ensure that the existing instream uses are protected. No Exceptional Value Waters are impacted by this discharge.

The designated use of the receiving waters are as follows:
UNT to Manada Creek (WWF, MF)

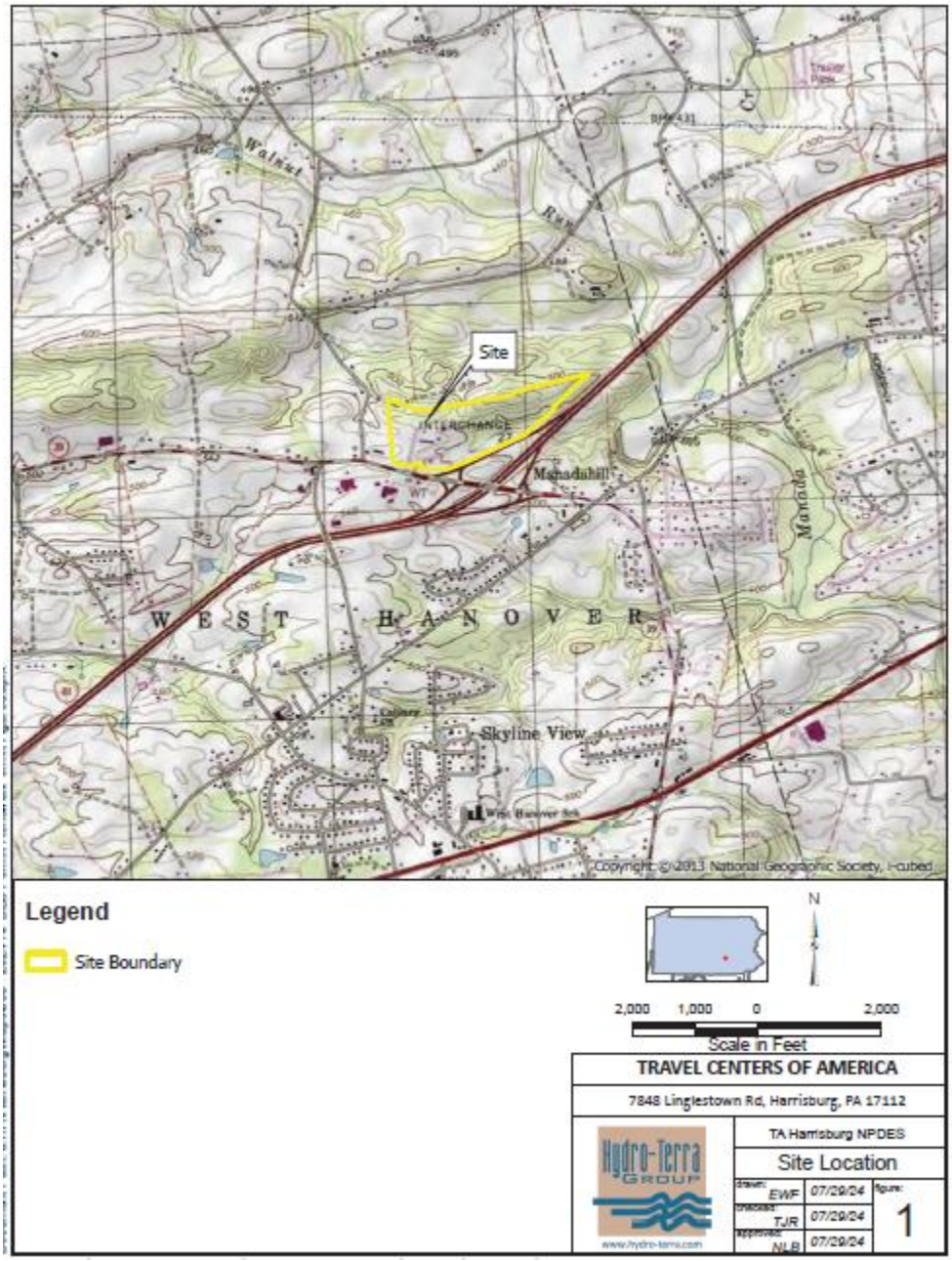

Figure 1. Site Location

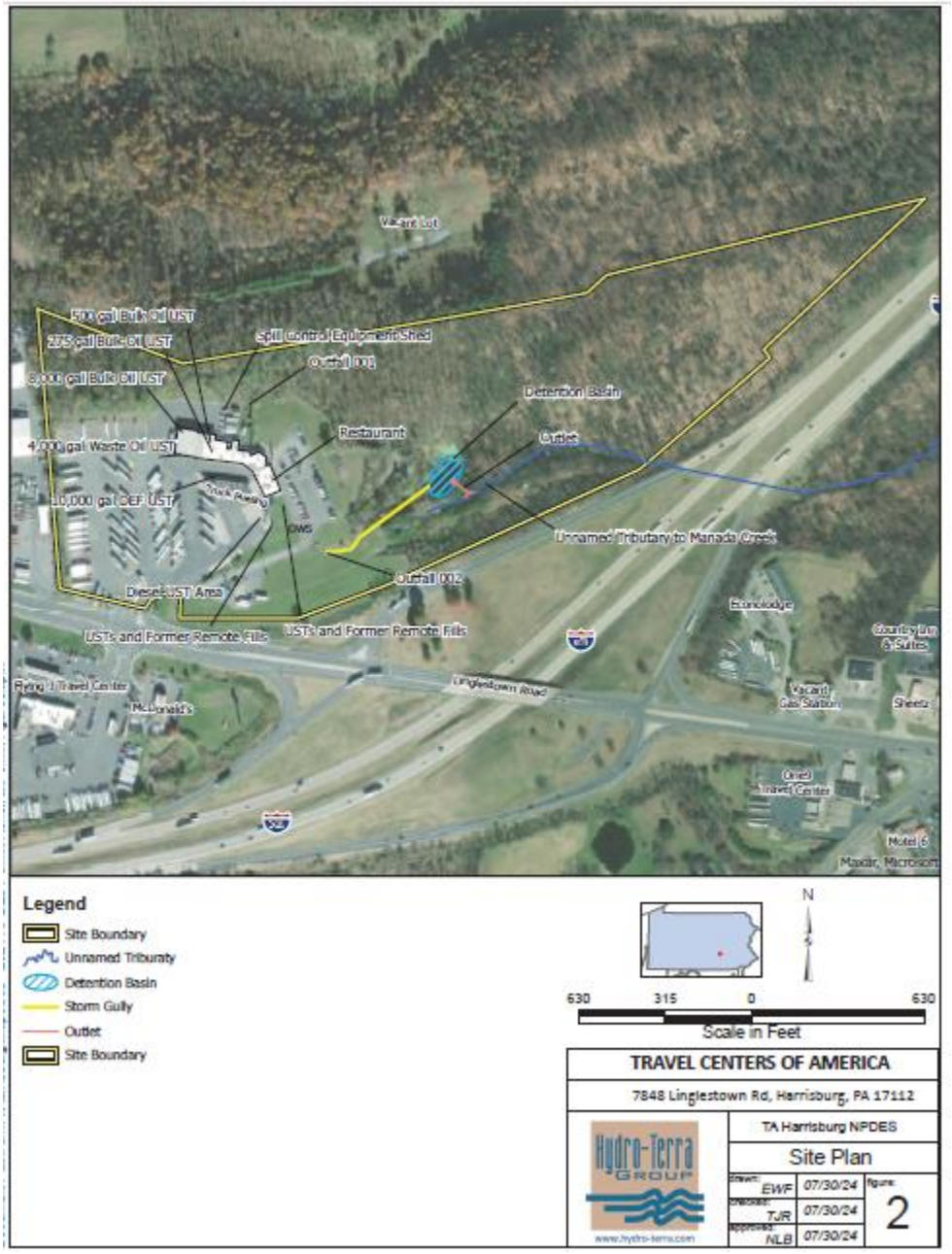

Figure 2. Site Plan