

Application Type Renewal
Facility Type Pesticides
Permit Type Individual

**NPDES PERMIT FACT SHEET
PESTICIDES**

Application No. PA0270806
APS ID 1033630
Authorization ID 1345471

Applicant and Facility Information

Applicant Name	<u>PA Turnpike Comm</u>	Facility Name	<u>PA Turnpike Comm</u>
Applicant Address	<u>PO Box 67676</u> <u>Harrisburg, PA 17106-7676</u>	Facility Address	<u>PO Box 67676</u> <u>Harrisburg, PA 17106-7676</u>
Applicant Contact	<u>John DelRicci</u>	Facility Contact	<u>John DelRicci</u>
Applicant Phone	<u>(717) 831-7399</u>	Facility Phone	<u>(717) 831-7399</u>
Client ID	<u>55964</u>	Site ID	<u>810467</u>
SIC Code	<u>0782</u>	Municipality	<u>Statewide</u>
SIC Description	<u>Agriculture - Lawn And Garden Services</u>	County	<u>Statewide</u>
Date Application Received	<u>March 9, 2021</u>	WQM Required	<u>No</u>
Date Application Accepted	<u>April 23, 2021</u>	EPA Waived	<u>No</u>
Purpose of Application	<u>Renewal of Statewide Pesticides Individual NPDES Permit</u>		

Internal Review and Recommendations

The Pennsylvania Turnpike Commission (PTC) submitted an application on March 9, 2021 for the renewal of an individual NPDES Permit for Discharges from the Application of Pesticides. The use of pesticides along the PTC's highway rights-of-way throughout the Commonwealth is managed by the PTC Maintenance office headquartered at 700 S Eisenhower Blvd, Middletown, PA, 17057.

The PTC uses pesticides to control a variety of weeds in and along turnpike rights-of-way to ensure and maintain a roadway free of obstruction for the safety of motorists. The PTC also seeks to maintain the aesthetic quality of roadside vegetated areas through the use of pesticides and planting of desirable vegetation. Pesticides are also used to aid in clearing and maintaining access areas and rest stops along the Turnpike. A Pesticides Discharge Management Plan (PDMP) was submitted with the application and includes the required elements listed in the permit application instructions.

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.

Approve	Deny	Signatures	Date
X		Zachary R Steckler Zachary R Steckler, EIT / Project Manager	September 8, 2021
X		Maria L. Schumack Maria L Schumack, PE / Environmental Engineer Manager	September 8, 2021

Internal Review and Recommendations

Open violations for PTC as of September 8, 2021 are listed in Table 1 below:

Table 1: Open Violations by Client

PF ID	FACILITY	PF KIND	PF STATUS	INSP PROGRAM	PROGRAM SPECIFIC ID	VIOLATION ID	VIOLATION DATE	VIOLATION CODE	VIOLATION
807446	PA TURNPIKE COMMISSION	Soils & Waterways	Active	WRM Water Obstructions & Encroachments	02-1764	913068	3/8/2021	105.44	Permittee has failed to perform work according to specifications as approved.
807446	PA TURNPIKE COMMISSION	Soils & Waterways	Active	WRM Water Obstructions & Encroachments	02-1764	913069	3/8/2021	105.51	Permittee has failed to operate or maintain permitted project.
578730	HOMEWOOD MAINT	Public Administration	Active	Storage Tanks	04-02270	927899	7/12/2021	245.437	Failure to comply with UST system periodic equipment testing requirements
578730	HOMEWOOD MAINT	Public Administration	Active	Storage Tanks	04-02270	927900	7/12/2021	245.437	Failure to comply with UST system periodic equipment testing requirements
582018	TREVOSE MAINT	Public Administration	Active	Storage Tanks	09-02296	927896	6/30/2021	245.437	Failure to comply with UST system periodic equipment testing requirements
582018	TREVOSE MAINT	Public Administration	Active	Storage Tanks	09-02296	927897	6/30/2021	245.437	Failure to comply with UST system periodic equipment testing requirements
593766	BLUE MTN TUNNEL	Public Administration	Active	Storage Tanks	28-60283	908188	2/11/2021	245.441	Failure to comply with underground storage tank system release detection requirements
598438	W MAINLINE TOLL PLAZA B18	Public Administration	Active	Storage Tanks	37-34876	927962	7/12/2021	245.437	Failure to comply with UST system periodic equipment testing requirements
				WPC Erosion & Sediment Control	851154	925663	7/22/2021	102.22STABIZ	Failure to permanently stabilize the earth disturbance site.
				WPC Erosion & Sediment Control	851154	925664	7/22/2021	691.402CO MPL	Failure to comply with permit conditions.

The PTC owns and maintains approximately 552 miles of roadway in Pennsylvania, with 17 service plazas and 28 maintenance facilities. The turnpike serves over 570,000 vehicles per day, including more than 80,000 commercial vehicles, and is critical infrastructure for goods business, commuters, and tourism.

Figure 1: PTC Treatment Area Map

Internal Review and Recommendations



Proposed Treatment Areas, Waterbodies, and Pesticides

The application is proposing the use of 19 different pesticides as needed over all of their existing rights-of-way throughout the Commonwealth. See Figure 1 above for a full map of PTC roadways and service plazas. Table 2 below shows the proposed pesticide chemicals as provided with the application package. It should be noted that the maximum dosage listed in Table 2 represents the maximum total annual application rate. All proposed application of pesticides is for roadside vegetation control, and no direct application to surface waters is being proposed. For all pesticides approved for use under this permit, all specifications on the product label must be followed.

Table 2: PA Turnpike Commission Herbicide List 2021

SAP #	Name	Container Size	Manufacturer	EPA Reg #	Max Annual Dose/Acre	Units	Target
5425	Garlon 3A	15 Gallon	Corteva	62719-176	10.7	gallon	weeds
5427	Pathfinder II	2.5 Gallon	Corteva	62719-176	10.7	gallon	weeds
5434	Accord XRT	15 Gallon	Corteva	62719-517	8	quart	weeds
5437	Krenite S	15 Gallon	DuPont	352-395	6	gallon	weeds
5439	Pendulum Aqua Cap	2.5 Gallon	BASF	241-416	6.3	Pints	weeds
5441	Oust Xtra	4 lbs.	DuPont	352-725	10.66	ounce	weeds
10083	Milestone VM	15 Gallon	Corteva	62719-537	7	ounce	weeds
10510	Escort XP	16 Ounce	DuPont	352-439	4	ounce	weeds
10511	Garlon 4 Ultra	2.5 Gallon	Corteva	62719-527	8	quart	weeds
11239	Esplanade 200SC	2.5 Gallon	Bayer	432-1516	10	ounce	weeds
12094	Polaris	2.5 Gallon	NuFarm	228-534	6	Pints	weeds
13909	Vastlan	15 Gallon	Corteva	62719-687	2	gallon	weeds
13917	Method 240 SL		Bayer	432-1565	18	ounce	weeds

Internal Review and Recommendations

13943	Prosedge 2	1.3 ounce	NuFarm	228-711	5.3	ounce	weeds
14443	Platoon	2.5 Gallon	NuFarm	228-145	8	Pints	weeds
15464	Telar XP	8 ounce	Bayer	432-1561	1.3	ounce	weeds
15484	Viewpoint DF	5 lbs.	Bayer	432-1580	20	ounce	weeds
15696	Specticle G	50 lbs.	Bayer	432-1523	200	Lbs.	weeds
15715	Vista XRT	2.5 Gallon	Corteva	62719-586	23	ounce	weeds

Because the treatment area is too large to perform a PNDI search, all appropriate state and federal agencies were contacted to inform them of this application and allow for agency concerns to be addressed to meet the PNDI search requirements. At this time, DEP has received responses from all state agencies confirming that this project will have no anticipated impact to resources of concern. A formal response is still needed from the US Fish and Wildlife Service (USFWS). DEP has been in contact with the USFWS, and impacts to resources of concern are not expected. DEP has made the decision to issue the draft permit, but the final permit will not be issued until the USFWS response is received.

Pesticides, maximum application doses, and treatment areas identified in the permit application and in this fact sheet will be authorized after issuance of the permit. The permittee must submit to DEP a request for approval for any change in the pesticide use pattern for an authorized treatment area, a change in the pesticide (active ingredient) that will be used for a treatment area, or an increase in the planned maximum dosage of pesticide that will be used in a treatment area. This request for approval may be submitted in lieu of a formal permit amendment. The permittee shall submit requests at least 30 days in advance of anticipated changes, and requests should include all applicable information regarding the pesticide application, treatment area and frequency, surface waters affected, and all other items as listed in part C.VI.A. of the NPDES Individual Pesticide permit, Authorized Pesticides and Application Rates. After a request for approval is submitted, permittees may implement the proposed changes after approval from DEP or after a period of 30 days.

Anti-Degradation

The PTC Maintenance Manual, Chapter 16, describes the public and environmental benefits of the proposed pesticides application program. By controlling roadside vegetation through a combination of mowing, pesticide application, and manual tree trimming or removal, they prevent vegetation encroachment on the roadway and limit undesirable pioneer and invasive plant development. The PTC is mandated by Act 74 (Noxious Weed Law) to control various weeds from spreading and overtaking adjacent land. Non-discharge alternatives considered and utilized by the PTC include mowing and manual pruning and removal of vegetation. The PTC also uses plantings of Birdsfoot Trefoil, fine fescue grasses, and wildflowers for their ability to establish and suppress unwanted weeds. While the PTC still employs these alternatives, the use of herbicides provides a substantial savings in both labor and equipment costs due to the size of the roadway system.

From the antidegradation module's ABACT section, "The PTC's policy regarding herbicides is to utilize chemicals that are approved for use by the Environmental Protection Agency (EPA), and applied by certified applicators approved and licensed as required by the Pennsylvania Pesticide Act. Our program is carefully planned and monitored to assure the most effective and environmentally safe results. The safety of pesticide chemicals (particularly the herbicides used along the roadway system) are given additional credence by the intensive research and laboratory tests required by the EPA prior to approval for marketing." Herbicide application will not occur around any open waterways or bridges and overpasses that span waterways. Aquatic pesticides may be used at water's edge in areas that are low lying or may contain perennial streams and wetlands, but pesticides will not be applied directly to water.

Because all pesticide application occurs in the areas immediately along the PTC's roadways, it is not expected that approval of this permit renewal will result in the degradation of any High Quality or Exceptional Value waterways as long as all Maintenance Manual, PDMP provisions and pesticide label specifications are followed..