Pennsylvania Department of Environmental Protection

Northwest Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0295515**
Facility Type	**Industrial**	APS ID	**1091279**
Major / Minor	**Minor**	Authorization ID	**1513548**

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

Applicant and Facility Information

Applicant Name	**Ta Operations LLC**	Facility Name	**Brookville Travel Center**
Applicant Address	245 Allegheny Boulevard	Facility Address	245 Allegheny Boulevard
	Brookville, PA 15825-2609		Brookville, PA 15825-2609
Applicant Contact	Raymond Dehner	Facility Contact	
Applicant Phone	(814) 849-3051	Facility Phone	
Client ID	143854	Site ID	239940
SIC Code	5541	Municipality	Brookville Borough
SIC Description	Retail Trade - Gasoline Service Stations	County	Jefferson
Date Application Received	November 30, 2023	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application: Brookville Travel Center submitted comments on the draft permit that the Department has taken into consideration and will need to redraft the permit to reflect the changes discussed.

Summary of Review

The following comments were received from TA Operations LLC regarding the draft permit for the Brookville Travel Center:

Flow Reporting for Outfall 002 and Outfall 006

The draft permit calls for the discharge from Outfalls 002 and 006 to be measured. Previously, the NPDES permits have allowed the discharge from these outfalls to be estimated. To accomplish this, AECOM would calculate the discharge did based on the stormwater collection area, paved versus unpaved areas, and the precipitation reported at nearby stations on Wunderground. Additionally, flow would be estimated by timing how long the discharge took to fill a 5-gallon bucket. Using these two methods, a relatively accurate average discharge could be calculated per event. As you are aware from our discussions, Outfall 002 and Outfall 006 are note equipped with discharge monitoring flow meters. The outfalls have intermittent storm-based discharge that can vary dramatically depending on the length and severity of the precipitation event. Outfall 002 is an emergency overflow for the final baffle of the oil-water separator. Discharge from this location would only occur in the event that the transfer pumps, which pump the water from the oil-water separator to the detention pond would fail, while water is being accumulated by the stormwater system. Additionally, discharge from Outfall 006 occurs when the detention basin has accumulated enough water to allow flow from the pond to the outfall location. Given the periodic discharge from these outfall locations and the expense and time required to design and implement a flow monitoring system within the outfall system, we would like to request that the flow reporting be based on an estimated value, as it has historically been calculated and reported.

Department Response:

Regarding the Flow Reporting for Outfall 002 and Outfall 006 comment, the Department will accept the proposition and change the flow monitoring from measured to estimate.

Approve	Deny	Signatures	Date
X		Dustin Hargenrater Dustin Hargenrater / Project Manager	April 14, 2025
X		Adam Olesnanik Adam Olesnanik, P.E. / Environmental Engineer Manager	April 17, 2025

Summary of Review

Monitoring Frequency for Outfall 006

Historically, the discharge from Outfall 006 has been sampled on semi-annual basis for total suspended solids (TSS) and oil and grease (O&S) in accordance with the PAG-03 general permit. The individual industrial waste draft permit requires sampling and reporting for pH, TSS, O&G, total metals including aluminum, iron, and manganese, total nitrogen, total phosphorus, and flow. The proposed reporting period for Outfall 006 has been increased to a weekly basis. Precipitation in the form of rain and snowmelt serves as the primary contributor to the stormwater system. As water flows across the surface, it is collected by the stormwater infrastructure, where is treated through the oil-water separator, which effectively captures hydrocarbons and other pollutants before the treated water is pumped to the detention pond. Although water is contributed to the stormwater system during fuel dispenser washdown activities, these contributions are minor compared to the overall stormwater volume managed during precipitation events. For discharge to occur from Outfall 006, a significant volume of water must enter the stormwater system, be pumped to the detention pond, and accumulate enough water within the pond to allow discharge to the outfall. Given the sporadic occurrence of precipitation generating weather events, it is not practicable to believe that the outfall will discharge weekly. Therefore, we are proposing that Outfall 006 continue to be sampled on a semi-annual basis during qualifying storm events.

We understand that PADEP is looking to understand the contribution associated with the industrial wastewater contribution to the discharges from TA. Therefore, we would like to propose a voluntary study to determine the impact of the industrial wastewater contribution, therefore we propose six monthly washdown events to demonstrate what the wash down what contributes to the facilities discharge. To demonstrate the washdown waters contribution, two samples will be collected from the stormwater system. The samples will be collected after all washdown activities have been completed and washdown water has entered the stormwater system. A representative grab sample will be collected from the final chamber of the oil-water separator, and another sample will be collected from the detention pond. If water is being discharged from Outfall 006, the pond sample will instead be collected from Outfall 006 at the discharge pipe. Prior to commencing these activities, a Sample and Analysis Plan will be developed and submitted to the Department for review and approval which will outline the sampling frequency, the calculated residence time, and the sampling locations and procedures.

Department Response:

Regarding the Monitoring Frequency for Outfall 006, the Department recognizes increased sampling frequency may be necessary if stormwater and vehicle washdown waters are continued to be monitored as a comingled discharge. As mentioned in the comment, the Department is trying to understand the contributions associated with the industrial wastewater portion of the discharges from Travel Centers of America. If Travel Centers of America would like to keep the existing monitoring frequency of 1/6 months at Outfall 006 the Department would propose the addition of an internal monitoring point (IMP) at the final chamber of the oil water separator with a monitoring frequency of 1/discharge to monitor the wash water separately from the stormwater. This new IMP would include the limits that were previously proposed at Outfall 006 and have a sample frequency of 1/discharge. This would require Travel Centers of America to sample the IMP anytime there is a discharge of wash water through the O/W separator. Outfall 006 will then receive monitoring for the parameters of the applicable PAG-03 appendix at a frequency of 1/6 months consistent with the PAG-03. Due to this change, the Department will need to re-draft the permit, which will provide Travel Centers of America another comment period to provide comments on the revised draft permit to the Department. Note, Outfall 002 would still be recognized as a discharge point in the event of an overflow or system failure with monitoring for Flow, pH, TSS, and Oil and Grease with a frequency of 1/discharge. For the sample frequencies of 1/discharge, if no discharge occurs at the outfall/IMP within the reporting period (monthly), a no discharge indicator (NODI) code should be added into the eDMR.

An additional meeting was held on 4/10/25 due to TA Operating LLC wishing to discuss these changes and what is feasible for the facility. TA Operating LLC did agree with the internal monitoring point that was proposed by the Department. Regarding the monitoring frequency of the discharges the Department has taken into consideration the frequency of discharges commencing, whether it be from stormwater or industrial process wastewater, and agreed that the most feasible monitoring frequency for these kinds of discharges would be once per month.

Proposed Changes from Draft Permit V1.0:

-Reduced limitations and monitoring frequency imposed at Outfall 006 to the stormwater requirements in the applicable appendix of the PAG-03 General Permit (Appendix L).

-Addition of IMP 106.

-Limitations previously proposed at Outfall 006 will now be imposed at IMP 106.

Summary of Review

-Reduction of monitoring frequency from 1/week to 1/month for the newly imposed limits at IMP 106.

-No changes to monitoring frequency or limitations imposed at Outfall 002, since this is an emergency outfall the Department does not expect that a regular discharge will occur, and the permittees have been advised to use the NODI (No Discharge) code on eDMR's to show that no discharge occurred from this outfall monthly. In the event that a discharge does occur, the imposed limits should be met to remain in compliance.

-Addition of Part C 118 condition for Chemical Additives. The Department believes the detergents used in the vehicle washdown processes would be considered a chemical additive and therefore the permittee will be subject to following the rules and regulations the department has regarding the use of Chemical Additives and outlined in this Part C condition.

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)	0
Latitude	41º 10' 15.25"	Longitude	-79º 6' 5.53"
Quad Name	Brookville	Quad Code	41079B1
Wastewater Description:	Emergency Overflow (IW), Stormwater		
Receiving Waters	Clement Run (CWF)	Stream Code	97499
NHD Com ID	123854430	RMI	
Drainage Area	0.24	Yield (cfs/mi^2)	0.035
Q_{7-10} Flow (cfs)	0.0084	Q_{7-10} Basis	USGS - StreamStats
Elevation (ft)	1,480	Slope (ft/ft)	---
Watershed No.	17-C	Chapter 93 Class.	CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	METALS		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status		Name	

Background/Ambient Data		Data Source
pH (SU)	7.54	Category 4b Re-Listing Document – Clement Run (2017)
Temperature (°F)	56.3	Category 4b Re-Listing Document – Clement Run (2017)
Hardness (mg/L)	141	Category 4b Re-Listing Document – Clement Run (2017)
Other:		

Nearest Downstream Public Water Supply Intake		Hawthorne Area Water Authority	
PWS Waters	Redbank Creek	Flow at Intake (cfs)	30.5
PWS RMI	28.0	Distance from Outfall (mi)	21.1

Changes Since Last Permit Issuance: No changes to Outfall 002 were proposed in this second iteration of the NPDES draft permit.

Other Comments: Outfall 002 is strictly an emergency outfall that only discharges in extreme rain events and is located shortly after the Oil Water Separator. The testing requirements at this outfall will be based on when the facility gets a rain event that would cause this outfall to be used.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	006	Design Flow (MGD)	0
Latitude	41º 10' 19.08"	Longitude	-79º 6' 12.93"
Quad Name	Brookville	Quad Code	41079B1
Wastewater Description:	IW Process Effluent without ELG, Stormwater		

Receiving Waters	Clement Run (CWF)	Stream Code	97499
NHD Com ID	123854430	RMI	
Drainage Area	0.18	Yield (cfs/mi^2)	0.0344
Q_{7-10} Flow (cfs)	0.0062	Q_{7-10} Basis	USGS - StreamStats
Elevation (ft)	1,507	Slope (ft/ft)	---
Watershed No.	17-C	Chapter 93 Class.	CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	METALS		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status		Name	

Background/Ambient Data		Data Source
pH (SU)	7.54	Category 4b Re-Listing Document – Clement Run (2017)
Temperature (°F)	56.3	Category 4b Re-Listing Document – Clement Run (2017)
Hardness (mg/L)	141	Category 4b Re-Listing Document – Clement Run (2017)
Other:		

Nearest Downstream Public Water Supply Intake		Hawthorne Area Water Authority	
PWS Waters	Redbank Creek	Flow at Intake (cfs)	30.5
PWS RMI	28.0	Distance from Outfall (mi)	21.2

Changes Since Last Permit Issuance: Limitations at Outfall 006 will now reflect that of the PAG-03 Appendix L for parameters. The monitoring frequency has been reduced to match the monitoring frequencies in Appendix L.

Other Comments: Outfall 006 is considered the main outfall of the facility, located after the sediment pond. Due to the sediment pond and outfall pipe structures, it is likely that this facility is not constantly discharge and likely wouldn't be discharging in low-flow conditions (Q_{7-10}). Therefore, modeling has not been performed for this facility as the models are based on low-flow conditions.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	106	Design Flow (MGD)	0
Latitude	41º 10' 15.25"	Longitude	-79º 6' 5.53"
Quad Name	Brookville	Quad Code	41079B1
Wastewater Description:	IW Process Effluent without ELG		

Receiving Waters	Clement Run (CWF)	Stream Code	97499
NHD Com ID	123854430	RMI	
Drainage Area	0.24	Yield (cfs/mi^2)	0.035
Q_{7-10} Flow (cfs)	0.0084	Q_{7-10} Basis	USGS - StreamStats
Elevation (ft)	1,507	Slope (ft/ft)	---
Watershed No.	17-C	Chapter 93 Class.	CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	METALS		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status		Name	

Background/Ambient Data		Data Source
pH (SU)	7.54	Category 4b Re-Listing Document – Clement Run (2017)
Temperature (°F)	56.3	Category 4b Re-Listing Document – Clement Run (2017)
Hardness (mg/L)	141	Category 4b Re-Listing Document – Clement Run (2017)
Other:		

Nearest Downstream Public Water Supply Intake		Hawthorne Area Water Authority	
PWS Waters	Redbank Creek	Flow at Intake (cfs)	30.5
PWS RMI	28.0	Distance from Outfall (mi)	21.2

Changes Since Last Permit Issuance: Limitations proposed at Outfall 006 in the first iteration of the draft permit have been transferred to IMP 106. IMP 106 is being proposed in order to characterize the wastewater associated with the vehicle washdown activities commencing at the site. Vehicle washdowns commence roughly once per month according to the permittee so the Department has agreed to decrease the monitoring frequency from 1/week to 1/month. Sampling at IMP 106 shall be conducted when the discharge is only Vehicle Washdown wastewater and not during any storm events.

Other Comments: IMP 106 is being imposed at the final chamber of the Oil Water Separator.

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

Outfall 002, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	Report	XXX	XXX	XXX	XXX	XXX	1/discharge	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/discharge	Grab
TSS	XXX	XXX	XXX	Report	XXX	100.0	1/discharge	Grab
Oil and Grease	XXX	XXX	XXX	15.0	XXX	30.0	1/discharge	Grab
Total Aluminum (ug/L)	XXX	XXX	XXX	Report	XXX	XXX	1/discharge	Grab
Total Iron (ug/L)	XXX	XXX	XXX	Report	XXX	XXX	1/discharge	Grab
Total Manganese (ug/L)	XXX	XXX	XXX	Report	XXX	XXX	1/discharge	Grab

Compliance Sampling Location: At Outfall 002, when a discharge is occurring.

Other Comments: This outfall is an emergency outfall that only discharges during extreme storm events. Monitoring frequencies of 1/discharge are proposed to properly characterize the effluent that is coming from this facility when the outfall is discharging.

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

Outfall 006, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 006.

Other Comments: TSS, Oil and Grease, Total Nitrogen and Total Phosphorous are the minimum treatment standards within the PAG-03 applicable appendix (Appendix L) and will remain with a frequency of 1/6 months.

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

Internal Monitoring Point (IMP) 106, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	Report	XXX	XXX	XXX	XXX	XXX	1/month	Estimate
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/month	Grab
TSS	XXX	XXX	XXX	Report	XXX	100.0	1/month	Grab
Oil and Grease	XXX	XXX	XXX	15.0	XXX	30.0	1/month	Grab
Total Aluminum (ug/L)	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Total Iron (ug/L)	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Total Manganese (ug/L)	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab

Compliance Sampling Location: IMP 106 (Final chamber of the Oil Water Separator, during dry weather).

Other Comments: TSS average monthly report and an IMAX limit of 100 mg/l are proposed as a minimum treatment standard. Oil and Grease limits of 15 mg/l average monthly and 30 mg/l instantaneous maximum are proposed as minimum treatment standards with facilities that have an Oil Water Separator installed. Total Aluminum, Total Iron, and Total Manganese are proposed as report only to ensure the facility is not causing or contributing to the receiving waters impairments.

Effluent Limit Development

Receiving Stream:
The receiving stream, Clement Run, is impaired for Parking lot runoff – Iron, Aluminum, Manganese, and Siltation and was on the Category 4b impairment listing which are used for compliance issues normally from point source discharges with an expectation that with remediation, the stream can achieve attainment of its designated aquatic life use within a reasonable time frame. A stream survey was done in 2017 to determine the accuracy of the Category 4b listing and examine the benthic community in the entire length of the stream. The ultimate conclusion of this study was that the facility will move from the Category 4b listing to List 5 of the report, which is for waters impaired for one or more designated uses by any pollutant which should lead to TMDL development at some point in the future.

Conventional Pollutants

Flow:
Due to concerns of the permittee, flow monitoring has been changed from Measured to Estimate as the facility does not have flow measuring devices installed and the staff available to measure the discharge rate would be limited.

pH:
pH will receive limits of an instantaneous minimum of 6.0 S.U. to an instantaneous maximum of 9.0 S.U. as a BAT limit from 25 Pa. Code §§ 92a.48(a)(2) and 95.2.

Oil and Grease:
The maximum reported concentration was greater than 8 mg/l so the facility will be subject to a 15 mg/l average monthly limit and an Instantaneous Maximum limit of 30 mg/l based on the SOP for Establishing Effluent Limits for Individual Industrial Waste Permits.

Total Suspended Solids:
Total Suspended Solids will have monitor and report for the monthly average and an instantaneous maximum limit of 100 mg/l. Based on the SOP for Establishing Effluent Limits for Individual Industrial Waste Permits the facility did report a value over 100 mg/l on a DMR during the 7/1/2020 – 12/31/2020 time period, therefore will be subject to the SOP BPJ TBELs based on 40 CFR § 125.3.

BPJ Analysis
There are no Effluent Limitation Guidelines (ELGs) developed for stormwater discharges from this class of industrial activity. In the absence of any ELG's, technology limitations are developed based on Best Professional Judgment. In establishing effluent limitations on a case-by-case basis, the appropriate technology for the applicant is considered. When evaluating appropriate BPJ limits for a permittee, the Department considers six factors as required by 40 CFR § 125.3.

The six factors are: (1) the age of the equipment and facility, (2) the process employed, (3) the engineering aspects of the application of various types of control technique, (4) process changes, (5) the cost of achieving such effluent reduction and, (6) non-water quality environmental impact (including energy requirements). Factors specific to each level of control technology include costs, pollutant reduction benefits and economic achievability. Each of these factors are discussed below as they relate to THE COMPANY.

1. Equipment and Facility Age – Industrial wastewater pollutants are preferably controlled through the implementation of best management practices (BMPs) and housekeeping. Only in rare cases should an industrial wastewater treatment system be considered. Brookville Travel Center may need to modify its industrial activities or invest resources into specialized pollution control equipment. Based upon the wastewater source (storm water), quantity (variable) and quality (sample analysis results), the Department anticipates compliance with the NPDES permit through the implementation of BMPs and housekeeping procedures. If, after implementing BMPs, Brookville Travel Center remains unable to meet its effluent limitations, the company may elect to enter into a Consent Order and Agreement with the Department to define a path to compliance.

1. The Process Employed – Brookville Travel Center may utilize a combination of best management practices and treatment technologies for sediment removal where effluent limitations are not met. BPJ effluent limitations are not based upon the installation of nor limited by the availability of specific treatment systems. As mentioned in the previous paragraph, the Department anticipates compliance with the proposed effluent limitations through implementation of BMPs. As such, any expenses associated with BMP implementation are minimal.

2. Engineering Aspects of Control Techniques – Additional BMPs and/or engineering solutions may be necessary if the facility is unable to meet its proposed effluent limitations. Pollutants are currently controlled through BMPs and unit treatment processes. Additional engineering solutions may be necessary if the facility is unable to meet its proposed effluent limitations. Technologies that may be needed to meet the proposed effluent limitations are commonly available (off-the-shelf). If a treatment system is necessary to meet the proposed effluent limits, the Department and Brookville Travel Center will evaluate the engineering aspects of the project at that time.

3. Process Changes – Operations at the site may need to be evaluated to identify and reduce the pollutant source(s) of TSS. The changes may include reductions in the amount of cleaning chemicals entering the wastewater stream, training of personnel, and or segregation of waste streams to meet the proposed effluent limitations. Additional remedies may be necessary if Brookville Travel Center cannot meet its proposed effluent limitations. Implementation of additional BMPs will not necessarily impact the core objectives of the company and are anticipated to be minimal. As such, process changes are not expected to add to the overall cost of operating the facility.

2. Non-Water Quality Environmental Impacts (Including Energy Requirements) – There are no known non-water quality environmental impacts or energy requirements associated with the installation of BMPs. The proposed effluent limits are appropriate and attainable using widely available BMPs and housekeeping measures.

In order to ensure that adequate BMPs are in place and effective, the Department proposes effluent limitations which are in line with the EPA's stormwater benchmark goals. These values are typical of the Department's PAG-03 Action Levels above which permittees are required to reduce their discharge concentrations. In addition, the Department believes that the high discharge concentrations of lead, copper, and iron are directly linked to the levels of solids in the effluent. The proposed effluent limitations are readily achievable using a combination of site-specific BMPs and general housekeeping procedures such as material cover, roadway and parking area sweeping, silt fencing, diversion channels, sediment traps, temporary seeding and erosion control blankets. If Brookville Travel Center is unable to meet the TSS effluent limitation, the construction of sedimentation technologies (i.e. a settling pond) may be necessary.

Appendix L Parameters:

These parameters will be subject to minimum standards set forth in the applicable PAG-03 appendix (Appendix L). The Appendix L parameters and BMP list will be attached.

Pollutant	Monitoring Requirements[1], [2]		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Suspended Solids (mg/L)	1 / 6 months	Grab	100
Oil and Grease (mg/L)	1 / 6 months	Grab	30
Total Nitrogen (mg/L)[3]	1 / 6 months	Calculation	XXX
Total Phosphorous (mg/L)	1 / 6 months	Grab	XXX

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.

V. SECTOR-SPECIFIC BMPs

In addition to the BMPs contained in Part C II of the General Permit, the permittee shall implement, at a minimum, all of the following BMPs that are applicable to the processes in place at the facility for which coverage under this General Permit is approved.

A. General BMPs

1. Vehicle and Equipment Storage Areas.

   Minimize the potential for stormwater exposure to leaky or leak-prone vehicles/equipment awaiting maintenance through implementation of control measures including but not limited to the following: use drip pans under vehicles/equipment; store vehicles and equipment indoors; install berms or dikes; use absorbents; roof or cover storage areas; and clean pavement surfaces to remove oil and grease.

2. Material Storage Areas.

   Maintain all material storage vessels (e.g., for waste oil/oil filters, spent solvents, paint wastes, hydraulic fluids) to prevent contamination of stormwater and plainly label them (e.g., “Waste Oil,” “Spent Solvents”). To minimize discharges of pollutants in stormwater from material storage areas, implement control measures including but not limited to the following: store materials indoors; install berms/dikes around material storage areas; minimize runoff of stormwater to the areas; use dry cleanup methods; and treat and/or recycle collected stormwater runoff.

3. Vehicle and Equipment Cleaning and Maintenance Areas.

   Minimize contamination of stormwater runoff from all areas used for vehicle/equipment cleaning through implementation of control measures including but not limited to the following: perform all cleaning operations indoors; use dry cleanup methods; ensure that all wash water drains to a proper collection system (i.e., not the stormwater drainage system); treat and/or recycle collected wash water; or other equivalent measures.

B. Locomotive BMPs.

Minimize discharges of pollutants in stormwater from locomotive sanding areas through implementation of control measures including but not limited to the following: cover sanding areas; minimize stormwater run on/runoff; or other appropriate sediment removal practices.

C. Petroleum Bulk Station and Terminal BMPs.

1. Pollution Prevention

   a. Stormwater runoff from areas where the runoff may come into contact with petroleum products or spills may not be discharged directly to surface waters unless the runoff is first treated to remove petroleum products.

   b. Stormwater collected in storage tank diked areas may be discharged to surface waters without treatment provided the following conditions are met.

   c. Each tank dike or discharge line shall contain a normally closed shut-off valve.

   d. The stormwater shall be visually inspected before discharge to confirm no visible sheen is present.

   e. Each discharge from diked areas shall be designated as an outfall (unless the permittee determines that a representative outfall can be selected), and stormwater samples shall be collected and analyzed in accordance with Section IV, above.

   f. The shutoff valve shall be closed following drainage under responsible supervision.

2. Unless it can be shown that an alternate design is equivalent and approval is granted, treatment facilities shall consist of an oil/water separator designed in accordance with American Petroleum Institute (API) specifications to meet or exceed the following standards:

   a. The separator shall be capable of treating 80 gallons per minute for each acre of land draining to it during the precipitation runoff period (e.g., a two-acre drainage area will require a separator designed to treat 160 gallons per minute).

   b. The horizontal velocity through the separator shall not exceed three feet per minute, except when rainfall produces a runoff exceeding 80 gallons per minute per acre of land draining to the separator. When such runoff occurs, there will be no limit on the horizontal velocity.

   c. The detention time of water flowing through the separator shall be at least 20 minutes except when rainfall produces a runoff exceeding 80 gallons per minute per acre of land draining to the separator. When such runoff occurs, the detention time may be less than 20 minutes.

   If the permittee proposes to utilize an oil/water separator that does not meet, or is not equivalent to, the design standards above, the permittee shall obtain a Water Quality Management (WQM) permit for the construction and operation of the proposed oil/water separator and its associated equipment.

3. Operation and Maintenance

   a. The oil/water separator shall be inspected after each precipitation event to ensure that the petroleum product is being properly removed. Petroleum products shall not be allowed to accumulate in the separator in amounts in excess of the design limitations of the separator, or in a manner which adversely affects the separator's operation.

   b. Solids build-up in the separator shall be measured after each precipitation event. When build-up exceeds either one foot in depth or the design criteria of the oil/water separator, or otherwise hinders the separator's operation, the solids shall be removed.

   c. Petroleum products and solids removed from the separator shall be handled and disposed of in a manner that is compliance with applicable laws and regulations.

   d. A record identifying the dates when solids and petroleum products are removed from the separator and the location of the disposal site shall be maintained for a period of at least three years. These records shall be made available upon request by DEP for inspection.

   e. There shall be no discharge of untreated tank bottom water into dike areas or into the stormwater collection, treatment, and discharge facilities. Tank bottom water which is periodically removed from storage tanks shall either: (1) be removed off-site to be disposed of in a manner consistent with the applicable laws of the Commonwealth of Pennsylvania, or (2) be treated on-site to remove petroleum products and other constituents to levels acceptable for on-site disposal.

4. Hydrostatic Test Water

   Hydrostatic test water may be discharged to diked areas, drainage swales or streams provided the following conditions are met:

   a. Tanks previously containing product shall be cleaned prior to hydrostatic testing and the wash/rinse water shall be removed. The wash/rinse water shall not be discharged to diked areas, drainage swales or streams.

   b. Hydrostatic test water shall be analyzed before discharge and shall achieve the following discharge requirements:

Pollutant	Discharge Concentration (mg/L)
Benzene	0.0025
BTEX	0.25

Pollutant	Discharge Concentration (mg/L)
Oil and Grease	30
Total Suspended Solids	60
Dissolved Iron	7.0
Total Residual Chlorine (TRC)	0.05
pH (S.U.)	6.0 – 9.0
Dissolved Oxygen (DO)	5.0

The permittee shall attach all analytical results for hydrostatic test water as well as the date, flow rate and duration of all discharges to the Annual Report required by the General Permit.

c. If the test water contains TRC above the discharge concentration requirement, the water may be drained to and held in a diked area until the TRC level meets the above standard, after which it may be released from the dike.

Toxic Pollutants

Total Aluminum, Total Iron, Total Manganese:

The receiving stream is impaired by Siltation/Parking Lot Runoff for Aluminum, Iron, Manganese, and Total Suspended Solids. The Total Suspended Solids effluent limit development and BPJ analysis are included above so this section will cover the proposed limits for Total Aluminum, Total Iron, and Total Manganese. Based on the SOP, 25 PA Code Chapter 92a.61, and the list of impairments of the receiving waters, the limits proposed for Total Aluminum, Total Iron, and Total Manganese will be monthly monitoring and reporting of the average monthly concentration at the facility. These will be imposed to ensure the facility is not causing or contributing to the in-stream impairment.