

Application Type Renewal  
 Facility Type MS4  
 Permit Type Individual

**NPDES PERMIT FACT SHEET**  
**MS4s**

Application No. PAI139602  
 APS ID 982371  
 Authorization ID 1254362

**Applicant and Facility Information**

Applicant Name	<u>PA Turnpike Commission</u>	Facility Name	<u>PA Turnpike Statewide MS4</u>
Applicant Address	<u>P. O. Box 67676</u> <u>Harrisburg, PA 17106-7676</u>	Facility Address	<u>P. O. Box 67676</u> <u>Harrisburg, PA 17106-7676</u>
Applicant Contact	<u>Bradley Heigel, Chief Engineer</u>	Facility Contact	<u>Bradley Heigel, Chief Engineer</u>
Applicant Phone	<u>(717) 831-7346</u>	Facility Phone	<u>(717) 831-7346</u>
Client ID	<u>55964</u>	Site ID	<u>760190</u>
SIC Code	<u>488490</u>	Municipality	<u>Harrisburg City</u>
SIC Description	<u>Other Support Activities for Road Transportation</u>	County	<u>Dauphin</u>
Date Application Received	<u>April 13, 2012</u>		
Date Application Accepted	<u>April 13, 2012</u>		
Purpose of Application	<u>Renewal of the Municipal Separate Storm Sewer System (MS4) permit</u>		

**Internal Review and Recommendations**

On April 13, 2012, DEP received an application to renew the individual NPDES permit for the Pennsylvania Turnpike Commission (PTC) to authorize continuation of stormwater discharges from its small regulated municipal separate storm sewer system (MS4). An individual permit has been historically required for PTC because DEP's General MS4 NPDES Permit (PAG-13) is not well suited to the nature of transportation agency activities such as those conducted by PTC. Despite these unique activities, PTC will be required to satisfy stormwater management responsibilities, which largely parallel those required of municipalities and other MS4 entities.

PTC was designated as an MS4 by EPA because of the potentially significant effect of its stormwater discharges on surface waters. The original permit was issued for the period April 28, 2006 through April 28, 2011. It was formally extended for one year which is why the April 2012 application submittal for permit reissuance was timely.

PTC is responsible for over 550 miles of roads. This permit regulates the 220 miles of those roads that are in Urbanized Areas. PTC is therefore a major generator of stormwater from the impervious surfaces of those roads. The Urbanized Areas used for this permit is as defined in the 2010 census generated by the U.S. Census Bureau.

PTC will provide Annual Reports to DEP to document ongoing compliance under this permit.

**Individual Permit Requirements**

***Authorized Discharges***

This permit authorizes stormwater discharges to surface waters of the Commonwealth from the permittee's regulated small MS4. In addition, the following non-stormwater discharges are authorized by this permit as long as such discharges do not cause or contribute to pollution as defined in Pennsylvania's Clean Streams Law:

1. Discharges or flows from firefighting activities.

Approve	Deny	Signatures	Date
X		/s/ Sean Furjanic, P.E., Program Manager	February 1, 2021

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2. Discharges from potable water sources including water line flushing and fire hydrant flushing if such discharges do not contain detectable concentrations of Total Residual Chlorine (TRC).
3. Non-contaminated Irrigation water.
4. Water from lawn maintenance.
5. Flows from riparian habitats and wetlands.
6. Diverted stream flows.
7. Springs.
8. Non-contaminated groundwater.
9. Water from foundation and footing drains.
10. Water from crawl space pumps.
11. Air conditioning condensation.
12. Individual residential car washing where cleaning agents are not used.
13. Routine external building wash down which does not use detergents or other compounds.
14. Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used.

The previous permit included dechlorinated swimming pool discharges as an authorized discharge. It was eliminated because of the potentially significant impact of pollutants in pool water in addition to chlorine. This permit also restricts individual residential car washing discharges to those in which cleaning agents are not used.

***Minimum Control Measures***

The six required Minimum Control Measures (MCMs) contained in PTC's draft permit have been customized to the unique activities and responsibilities of PTC as has been done throughout the history of PTC's permits and as discussed below.

1. Public Education and Outreach on Stormwater Impacts

The goal of this MCM is to disseminate information to the users of the Pennsylvania Turnpike (customers, general public, employees, and prime contractors with active contracts) about the impacts of stormwater pollution on surface waters, and the steps that all parties can take to reduce pollutants in stormwater runoff. To accomplish this goal, PTC will continue to maintain and implement its Public Education and Outreach Program, maintain lists of target audience groups, integrate stormwater pollution impact awareness into ongoing activities, utilize general stormwater management educational materials, and implement a Stormwater Pollution Impact Awareness Campaign.

Modifications from the previous permit include 1) measuring the volume of educational materials distributed to customers and the general public, and comparing employee and prime contractor pre- and post-training results of quizzes or similar evaluation methods to measure the effectiveness of pollution impact awareness efforts; 2) upgrading PTC's public website; and 3) training employees and active prime contractors on how to control stormwater pollution at construction sites.

2. Public Involvement / Participation

### Internal Review and Recommendations

The goal of this MCM is to provide for public involvement in the MS4's stormwater program. PTC will satisfy applicable public notice requirements and will issue MS4 Coordination Letters to municipalities with shared Urbanized Areas which provide information on stormwater management activities and invite interest in collaboration activities. Coordination meetings will be held with municipal officials who express interest. PTC will continue to implement a mechanism in which anyone who has knowledge of an illicit discharge can report it, for investigation by PTC. PTC will also seek public review and comment of its Pollutant Reduction Plans (see below).

#### 3. Illicit Discharge Detection and Elimination (IDD&E)

The goal of this MCM is to reduce the discharge of illicit discharges to surface waters. To accomplish this goal PTC will implement its Illicit Discharge Detection and Elimination (IDD&E) Program Manual. The manual requires procedures for identifying priority areas, screening outfalls, identifying and eliminating pollution sources, and documentation. DEP must approve changes to the IDD&E Manual. If changes are proposed and DEP does not respond within 60 days the changes will be considered approved.

PTC will update its existing maps that show Urbanized Areas, outfalls, observation points, and surface waters. Those maps will be made available to neighboring municipal permittees. Maps will be developed to show the entire storm sewer collection system.

PTC will conduct dry weather screenings of its outfalls and observation points to identify illicit discharges in accordance with PTC's IDD&E Manual. Screenings will be done at least once within the permit term, with the exception of priority outfalls and observation points as described in the IDD&E Manual, which will receive more frequent screenings. No screenings will be required at observation points where discharges are to municipal storm sewers if municipal officials have been provided with mapping and PTC contact information. All screenings will be documented regardless of whether illicit discharges are detected. Discharges that exhibit indicators of illicit discharges (color, odor, floating solids, scum or sheen) will be evaluated, and action will be taken to eliminate illicit discharges. PTC must also provide training to employees and prime contractors with active roadway construction contracts on how to detect and report illicit discharges.

#### 4. Construction Site Stormwater Runoff Control

The goal of this MCM is to minimize erosion and sedimentation from construction sites. PTC compliance will be demonstrated through satisfaction of requirements in Chapter 102 permits, and documented through inspections by DEP and/or county conservation districts.

#### 5. Post-Construction Stormwater Management (PCSM)

The goal of this MCM is to construct and maintain PCSM Best Management Practices (BMPs). To accomplish this goal, PTC will develop PCSM Plans and obtain permits and install BMPs required by Chapter 102 when necessary for construction projects. A BMP inventory must be maintained, and continued operation will be confirmed through inspections and/or agreements with municipalities. The permit requires implementation of PTC's Stormwater Control Measure Operations and Maintenance (SCMOM) Manual. DEP must approve changes to the SCMOM Manual. If changes are proposed and DEP does not respond within 60 days the changes will be considered approved.

#### 6. Pollution Prevention / Good Housekeeping

The goal of this MCM is to prevent stormwater pollution from PTC operations. The permit requires implementation of PTC's Maintenance Manual to provide a clean roadway surface and stormwater conveyance system. DEP must approve changes to the Maintenance Manual. If changes are proposed and DEP does not respond within 60 days the changes will be considered approved.

PTC must maintain an inventory of its operations and implement a written operation and maintenance program for each operation. PTC will conduct inspections of the operations and training will be provided to employees. PTC must implement and maintain its good housekeeping program for the permittee's maintenance facilities, stockpiles, and service plazas that have the potential for generating pollution in stormwater runoff to the regulated small MS4 including building maintenance; vehicle operation, fueling, washing, and maintenance; and material transfer operations.

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PTC will take actions to minimize pollution from salt storage and distribution facilities to ensure that they are covered and that during weather events salt is exposed only as much as necessary.

#### **Pollutant Load Reductions**

Similar to the PAG-13 General Permit, DEP is establishing a requirement in PTC's permit to develop and implement Pollutant Reduction Plans (PRPs). PTC's PRPs will estimate the stormwater pollutant load generated from PTC roads in Urbanized Areas and identify BMPs to be constructed during the permit term to eliminate a portion of that pollutant load. Load calculations will not include roads in areas served by combined sewer systems.

PTC will seek collaborative arrangements with municipalities which also have PRP requirements. Municipalities that have shared responsibilities with other municipalities have benefited from the resultant economy of scale. DEP believes there is at least as much potential advantage in PTC/municipal collaboration. PTC projects are often of larger scale than what would typically be pursued by municipalities. PTC is however frequently constrained to the limited unpaved area available within the right-of-way. Collaborative arrangements may, for example, involve PTC construction of a BMP on land outside the right-of-way with maintenance to be the responsibility of the municipality. The terms of such arrangements are not constrained by this permit; they will be negotiated between PTC and the municipality. DEP provides an incentive for PTC/municipal collaboration by allowing both parties to take full PRP credit for such projects. Such crediting is allowed when both the municipality and PTC roads are included the drainage area to the BMP as part of their existing load calculation.

A major challenge for PTC is the long planning period (often 10 years or more) that is typically required for road construction projects. Fortunately, PTC has anticipated the PRP requirement and has begun BMP planning in advance of permit issuance.

PTC has the option to construct standalone BMPs (which would not be tied to road construction projects), but for efficiency and budgeting reasons, implementing PRP BMPs as part of roadway construction projects is preferred. The load reductions to be credited to the PRP requirement will be those that are "above-and-beyond" what is required for new construction under Chapter 102 PCSM requirements.

Municipal MS4s enjoy the option to plan their PRP load reductions on a local watershed scale because it is not practical to implement load reductions to every stream in a 5-year permit term. A similar logic will be applied for PTC, but at a larger scale. Roads are typically built or rebuilt with a planning period of 20-40 years. As such, it is not feasible to require load reductions for every stream or local watershed in a 5-year permit term. As a result, DEP is requiring PTC to prepare its PRPs on a major watershed scale. There will be separate PRPs developed by PTC for: 1) the Susquehanna River/Potomac River (Chesapeake Bay) watershed, 2) the Ohio River watershed, and 3) the Delaware River watershed. Each PRP will have its own pollutant load calculation based on the road area in the Urbanized Area in that watershed, a load reduction based on that load calculation, and a list of BMPs to provide the pollutant load reductions in each watershed. PTC has no obligation to reduce stormwater pollution in the Lake Erie watershed because it owns no roads there.

The proposed load reductions for the 5-year permit term take into account the relative major basin priority and the long planning period needed for road projects. For the Chesapeake Bay watershed, which is a DEP and U.S. Environmental Protection Agency priority, reductions will be 10%, 5% and 3% for sediment, Total Phosphorus (TP) and Total Nitrogen (TN), respectively. For the Ohio River and Delaware River watersheds, 5% sediment and 2.5% TP load reductions will be required for each. The existing pollutant load in the Chesapeake Bay watershed will be calculated for all PTC property in the Urbanized Area. In the other watersheds, the load will be calculated for PTC property in local watersheds impaired due to sediment and/or TP and located in the Urbanized Area. In addition, PTC will have the flexibility to shift the credit for load reductions, within limits, between the Ohio River and Delaware River watersheds. That flexibility will result in more overall reductions than would otherwise be achievable by PTC because of the limited opportunities for BMP installation which results from the extended planning period for major highways. No credit shift will be allowed for the reductions required in the Chesapeake Bay watershed. PTC will provide a report of actual load reductions achieved at the end of the permit term for each PRP.

Each PRP will be subject to public participation requirements. The PRPs will be available for review on the PTC website and notice of the availability of draft PRPs will be published in the *Pennsylvania Bulletin* for public comment. All comments received will be provided to DEP along with a PTC evaluation of each comment.

There is no requirement in the permit for an MS4 Total Maximum Daily Load (TMDL) Plan because PTC is not assigned wasteload allocations in any TMDL.

### Internal Review and Recommendations

The PAG-13 General Permit requires Pollutant Control Measures (PCMs) for permittees with discharges to waters impaired by Abandoned Mine Drainage, Pathogens or Priority Organic Compounds. PCMs differ from PRPs in that they involve a compilation of available information on sources of those pollutants, but PCMs do not require a specific pollutant reduction during the permit term. The draft PTC permit does not include a PCM requirement because it is unlikely that PTC-owned property discharges contain pollutants associated with the PCMs of PAG-13.

#### Public Participation

The Department of Environmental Protection (DEP) will publish notice of the receipt of the National Pollutant Discharge Elimination System (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.