

Application Type Renewal  
Facility Type Storm Water  
Major / Minor Minor

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

Application No. PAS803505  
APS ID 711493  
Authorization ID 1443207

**Applicant and Facility Information**

Applicant Name	<u>HPT-PSC Properties Trust</u>	Facility Name	<u>Petro Stopping Center Carlisle</u>
Applicant Address	<u>24601 Center Ridge Road</u> <u>West Lake, OH 44145</u>	Facility Address	<u>1201 Harrisburg Pike</u> <u>Carlisle, PA 17013-1647</u>
Applicant Contact	<u>Clayton Barns</u>	Facility Contact	<u>Clayton Barns</u>
Applicant Phone	<u>(440) 808-4431</u>	Facility Phone	<u>(440) 808-4431</u>
Client ID	<u>262080</u>	Site ID	<u>513557</u>
SIC Code	<u>5399,5411,7538</u>	Municipality	<u>Middlesex Township</u>
SIC Description	<u>Retail Trade - Grocery Stores,Retail Trade - Miscellaneous General Merchandise Stores,Services - General Automotive Repair Shops</u>	County	<u>Cumberland</u>
Date Application Received	<u>June 8, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>July 6, 2023</u>	If No, Reason	<u></u>
Purpose of Application	<u>NPDES discharge of stormwater associated with industrial activity.</u>		

**Summary of Review**

This is a renewal application for a NPDES Individual Permit for Discharges of Stormwater Associated with Industrial Activity (Individual Permit) located in Middlesex Township, Cumberland County. See Figures 1 through 4 for site location and layout maps.

Facility Description, from GIF: Retail truck fueling and maintenance center.

The facility's primary SIC code is 7538 (general automotive repair shop). The facility's secondary SIC codes are 5411 (grocery stores) and 5399 (general merchandise stores). The facility's SIC Codes are not directly referenced in 40 CFR § 122.26(b)(14). According to the 2010 Protection Report when the NPDES permit was first issued, Middlesex Township requested PADEP involvement because of the condition of basin 1 and potential discharge to Letort Spring Run (HQ-CWF) from the oil/water separator. Since the facility discharges to an HQ-CWF surface water, the facility does not qualify for a PAG-03 NPDES General Permit for Discharges of Stormwater Associated with Industrial Activities (PAG-03) and must be covered under an Individual Permit.

An application was received 6/8/2023. The application was deemed complete on 7/6/2023.

There is one permitted outfall at the site, Outfall 001. From the application, *the 2,000-gallon oil/water separator (OWS) is used to collect spills that occur in the truck diesel fueling area. The canopy over the fueling area prevents and minimizes stormwater from entering the OWS. The separator is cleaned on an as-needed basis, and water only discharges from the separator when it becomes full, at which time stormwater enters an underground drainage line that empties at Detention Basin 1. Outfall 001 is the entry point of this line into the basin. The OWS is checked regularly by facility staff. In the event*

Approve	Deny	Signatures	Date
X		<i>Jacob S. Rakowsky</i> Jacob S. Rakowsky, E.I.T. / Project Manager	10/25/2023
X		<i>Scott M. Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager	10/25/2023

### Summary of Review

*water from the separator enters Detention Basin 1, it combines with stormwater runoff from the site. Detention Basin 1 acts as a mechanism to promote settling of solids. A concrete baffle holds any floating hydrocarbons on the Detention Basin 1 between Outfall 001 and Letort Spring Run. The baffle barrier near the southern side of the basin acts as an additional feature to prevent floating hydrocarbons from leaving the detention basin.*

Per the application, the PPC Plan was last updated in 2009.

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. There are no open violations for the client that would warrant withholding the issuance of this permit.

EPA waiver is in effect.

#### 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.	<u>001</u>	Design Flow (MGD)	<u>N/A</u>
Latitude	<u>40° 13' 50"</u>	Longitude	<u>-77° 8' 17"</u>
Wastewater Description: <u>Stormwater associated with industrial activities.</u>			
Receiving Waters	<u>Letort Spring Run (HQ-CWF, MF)</u>	Stream Code	<u>10261</u>
NHD Com ID	<u>56405761</u>	RMI	<u>0.74</u>
Drainage Area	<u>18.1 sq. mi.</u>	Yield (cfs/mi <sup>2</sup> )	<u></u>
Q <sub>7-10</sub> Flow (cfs)	<u>16.6</u>	Q <sub>7-10</sub> Basis	<u>StreamStats</u>
Watershed No.	<u>7-B</u>	Chapter 93 Class.	<u>HQ-CWF, MF</u>
Existing Use	<u></u>	Existing Use Qualifier	<u></u>
Exceptions to Use	<u></u>	Exceptions to Criteria	<u></u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u></u>		
Source(s) of Impairment	<u></u>		
TMDL Status	<u></u>	Name	<u></u>
Nearest Downstream Public Water Supply Intake	<u>PA American Company West</u>		
PWS Waters	<u>Conodoguinet Creek</u>	PWS Municipality	<u>Silver Spring Twp, Cumberland County</u>
PWS RMI	<u>19.10</u>	Distance from Outfall (mi)	<u>~15</u>

Drainage Area: 6,600 SF

% Impervious: 100%

Description of Materials/Activities in Drainage Area Exposed to Precipitation: Diesel fuel island

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater: Basin and hydrodynamic device

<b>Compliance History</b>	
<b>Summary of DMRs:</b>	A summary of available eDMR data can be found in Table 1 below.
<b>Summary of Inspections:</b>	A compliance evaluation inspection was conducted at the facility on 12/2/2019. No violations were noted.

The client currently has open violations with PADEP Southcentral Region Storage Tanks Program that will need to be addressed prior to issuing their final permit.

**Table 1.** Summary of eDMR Data for Outfall 001

	<b>Outfall 001</b>	<b>pH</b>	<b>Oil and Grease</b>	<b>Benzene</b>	<b>Naphthalene</b>	<b>TRPH</b>	
<b>eDMR Data</b>	<b>2023 2Q</b>	6.82	5.0	0.0009	0.0011	5.0	
	<b>2023 1Q</b>	7.40	9.2	0.0030	0.0025	6.0	
	<b>2022 4Q</b>	7.40	16.6	0.0035	0.0024	12.0	
	<b>2022 3Q</b>	7.30	4.9	0.0050	0.0005	5.0	
	<b>2022 2Q</b>	7.02	5.1	0.0009	0.0008	5.0	
	<b>2022 1Q</b>	6.97	7.2	0.0016	0.0023	5.0	
	<b>2021 4Q</b>	7.31	5.4	0.0013	0.0008	5.0	
	<b>2021 3Q</b>	8.20	7.5	0.0005	0.0015	5.0	
	<b>2021 2Q</b>	9.05	5.1	0.0005	0.0005	5.0	
	<b>2021 1Q</b>	7.12	5.6	0.0028	0.0048	5.0	
		<b>Min.</b>	6.82	4.9	0.0005	0.0005	5.0
		<b>Max.</b>	9.05	16.6	0.0050	0.0048	12.0
		<b>Avg.</b>	7.46	7.2	0.0020	0.0017	5.8
<b>Permit Limits</b>	<b>Inst. Min.</b>	6.0	-	-	-	-	
	<b>Daily Max.</b>	-	-	0.010	-	-	
	<b>Inst. Max.</b>	9.0	30	0.015	-	-	
	<b>Avg. Quarterly</b>	-	15	0.005	-	-	

**Table 2.** The facility's previous permit required the following monitoring requirements:

Parameter	Effluent Limitations					Minimum Measurement Frequency Average Monthly	Required Sample Type
	Concentrations (mg/L)						
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum			
pH (S.U.)	6.0 Inst Min	XXX	XXX	9.0	1/quarter	Grab	
Oil and Grease	XXX	15	XXX	30	1/quarter	Grab	
Total Recoverable Petroleum Hydrocarbons	XXX	Report	Report	XXX	1/quarter	Grab	
Benzene	XXX	0.005	0.010	0.015	1/quarter	Grab	
Naphthalene	XXX	Report	Report	XXX	1/quarter	Grab	

The parameters in the previous permit were chosen by referencing the monitoring requirements in the PAG-05 NPDES permit for discharges from petroleum products contaminated groundwater remediation systems. TRPH was retained in the previous permit as an indicator of hydrocarbon compounds. The sampling frequency was reduced to 1/quarter from 2/month in the previous permit.

**The following Part C special conditions were included in the previous permit:**

1. The number of discharges occurring from small Basin 1 and large Basin 2 during each month shall be reported in the comments area of the quarterly DMR. A record showing the dates when small Basin 1 and large Basin 2 discharges occur shall be kept for a period of at least 3 years. These records shall be made available upon request by DEP for inspection.
2. When a sample is unable to be collected from the discharge due to adverse climatic conditions, samples shall be collected directly from Basin 1.
3. The permittee shall implement at least the following BMPs:
  - Discourage “topping off” of fuel tanks.
  - Use dry cleanup methods with absorbent materials instead of hosing down work areas.
  - Minimize exposure of fuel areas to stormwater.
  - Cover roll-off containers.
  - Inspect and clean out stormwater catch basins or cleanouts on a regular basis.
  - Practice good housekeeping by promptly cleaning up leaks/spills, and removing debris and trash from parking lot and adjacent areas.
  - Install and maintain absorbent booms or blankets in Basin 1.
  - Inspect oil/water separators after each rainfall exceeding ½” in 24 hours to ensure petroleum product is being properly removed. Product 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.
  - Solids build-up in the oil/water separator shall be measured after each of the above rainfall events. When build-up exceeds either 1-foot depth or the design capacity of the oil/water separator, or otherwise hinders the separator’s operation, the solids shall be removed before the next rainfall.
  - Petroleum products and solids removed from the separator shall be handled and disposed of in a manner that will not violate the laws of the Commonwealth of Pennsylvania.
  - A record showing the dates when solids and petroleum products are removed from the separator and the location of the disposal site shall be kept for a period of at least 3 years. These records shall be made available upon request by DEP for inspection.
  - Annually inspect sediment levels in detention basins. Clean and remove sediment and debris from detention basins to maintain proper operation.
  - Remove floatables from basins to prevent accumulation.

**Proposed Effluent Limitations and Monitoring Requirements**

Recommendations for this permit renewal:

1. It is recommended to incorporate the current PAG-05 (9/2023) monitoring requirements for petroleum products into this permit. All parameters from the PAG-05 will be incorporated except for flow. Since this is a stormwater permit, flow is not applicable.
2. It is recommended to incorporate the numerical limits from the PAG-05 into the monitoring requirements for this permit.
3. It is recommended to reduce the PAG-05 monitoring frequencies from 1/month to 1/quarter for this permit.
4. It is recommended to include the BMPs from PAG-03 Appendix J (additional facilities) in this permit.
5. It is recommended to add monitoring requirements for Total Nitrogen and Total Phosphorus, as these parameters are now required to be sampled for all PAG-03s.
6. It is recommended to include the Part C special conditions from the previous permit into this permit.

**Table 3.** Proposed Monitoring Requirements

Parameter	Effluent Limitations				Monitoring Requirements <sup>(1)</sup>	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Quarterly	Daily Maximum	Instant. Maximum		
Benzene (mg/L)	XXX	0.001	XXX	0.0025	1/quarter	Grab
Total BTEX (mg/L)	XXX	0.1	XXX	0.25	1/quarter	Grab
Total Suspended Solids (mg/L)	XXX	30	XXX	75	1/quarter	Grab
Oil and Grease (mg/L)	XXX	15	XXX	30	1/quarter	Grab
pH (S.U.)	6.0 Inst Min	XXX	XXX	9.0	1/quarter	Grab
Dissolved Iron (mg/L)	XXX	XXX	XXX	7.0	1/quarter	Grab
Total Nitrogen (mg/L) <sup>(2)</sup>	XXX	XXX	Report	XXX	1/quarter	Calculation
Total Phosphorus (mg/L)	XXX	XXX	Report	XXX	1/quarter	Grab

Footnotes

- (1) This is the minimum number of sampling events required. Permittees may optionally perform additional sampling.
- (2) Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO<sub>2</sub>+NO<sub>3</sub>-N), where TKN and NO<sub>2</sub>+NO<sub>3</sub>-N are measured in the same sample.

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 discharge to a High Quality (HQ) or Exceptional Value (EV) water, so Module 1 (Anti Degradation Module) was not included with 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:  
 Letort Spring Run (HQ-CWF)



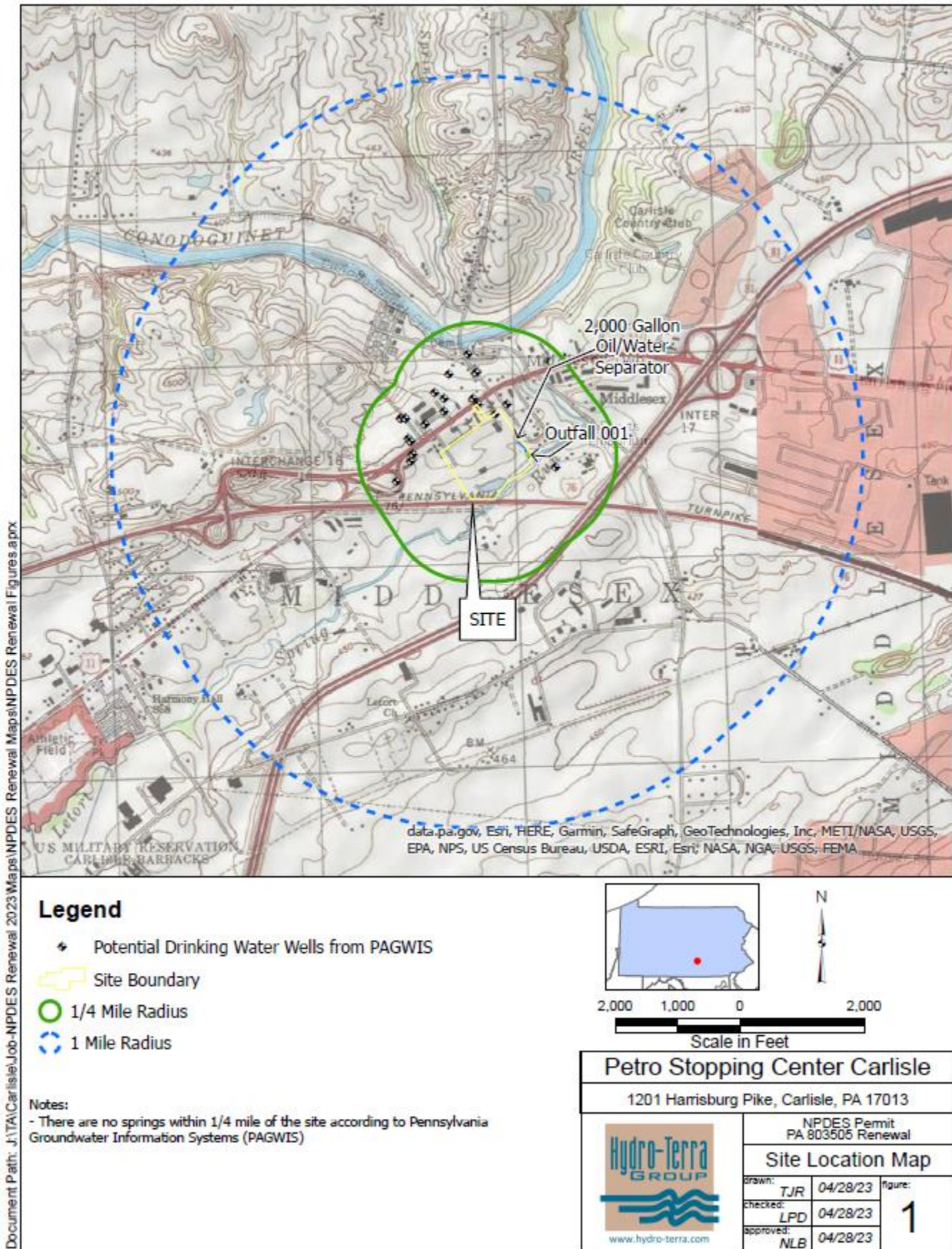


Figure 1. Site Location Map

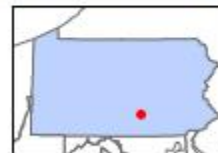




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**Legend**

 Site Boundary



240 120 0 240



Scale in Feet

**Petro Stopping Center Carlisle**

1201 Harrisburg Pike, Carlisle, PA 17013

NPDES Permit  
 PA 803505 Renewal

**Site Map**



drawn:	TJR	04/25/23	figure: <b>2</b>
checked:	LPD	04/25/23	
approved:	NLB	04/25/23	

Coordinate System: NAD 1983 2011 StatePlane Pennsylvania South FIPS 3702 Ft US

Figure 2. Site Map



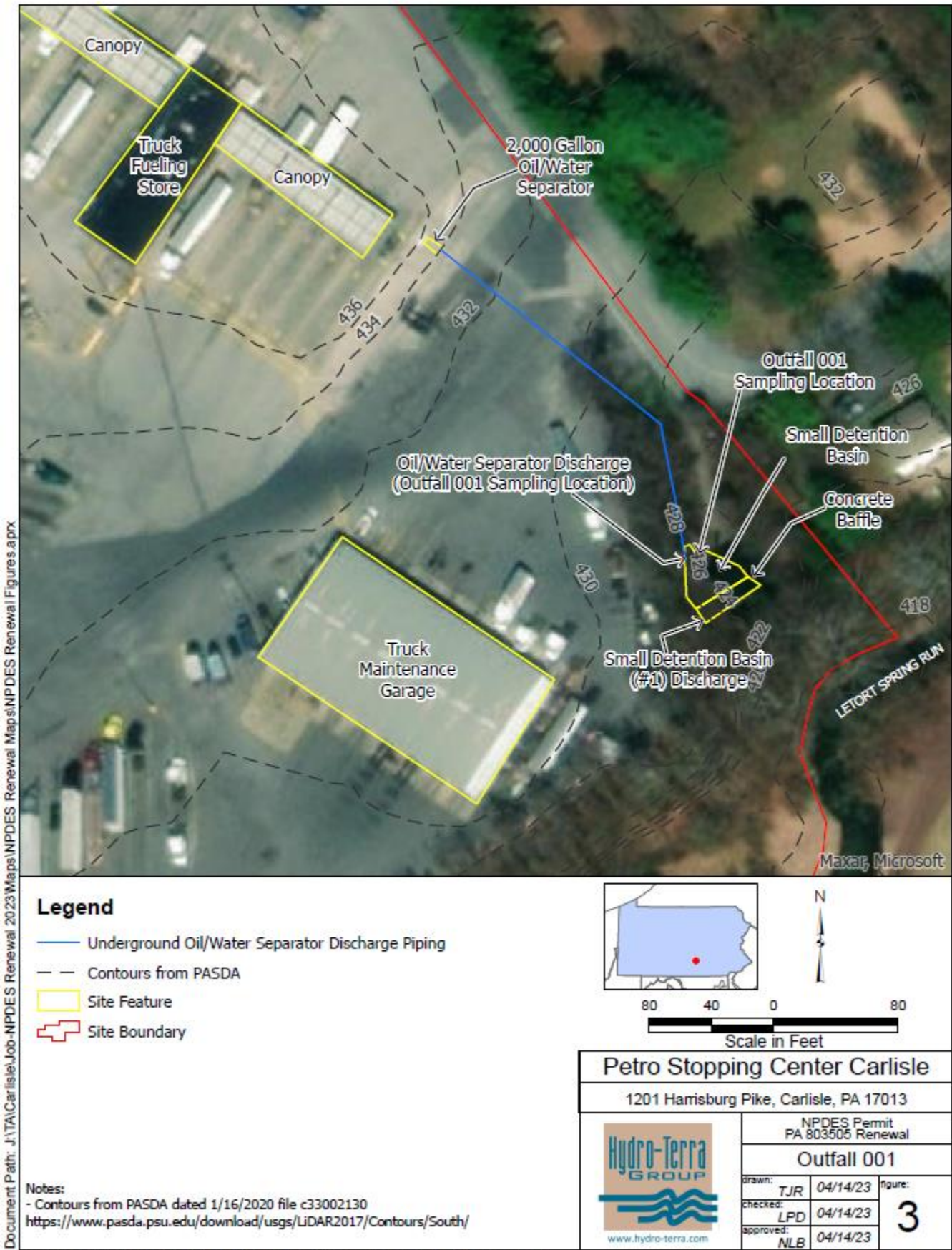
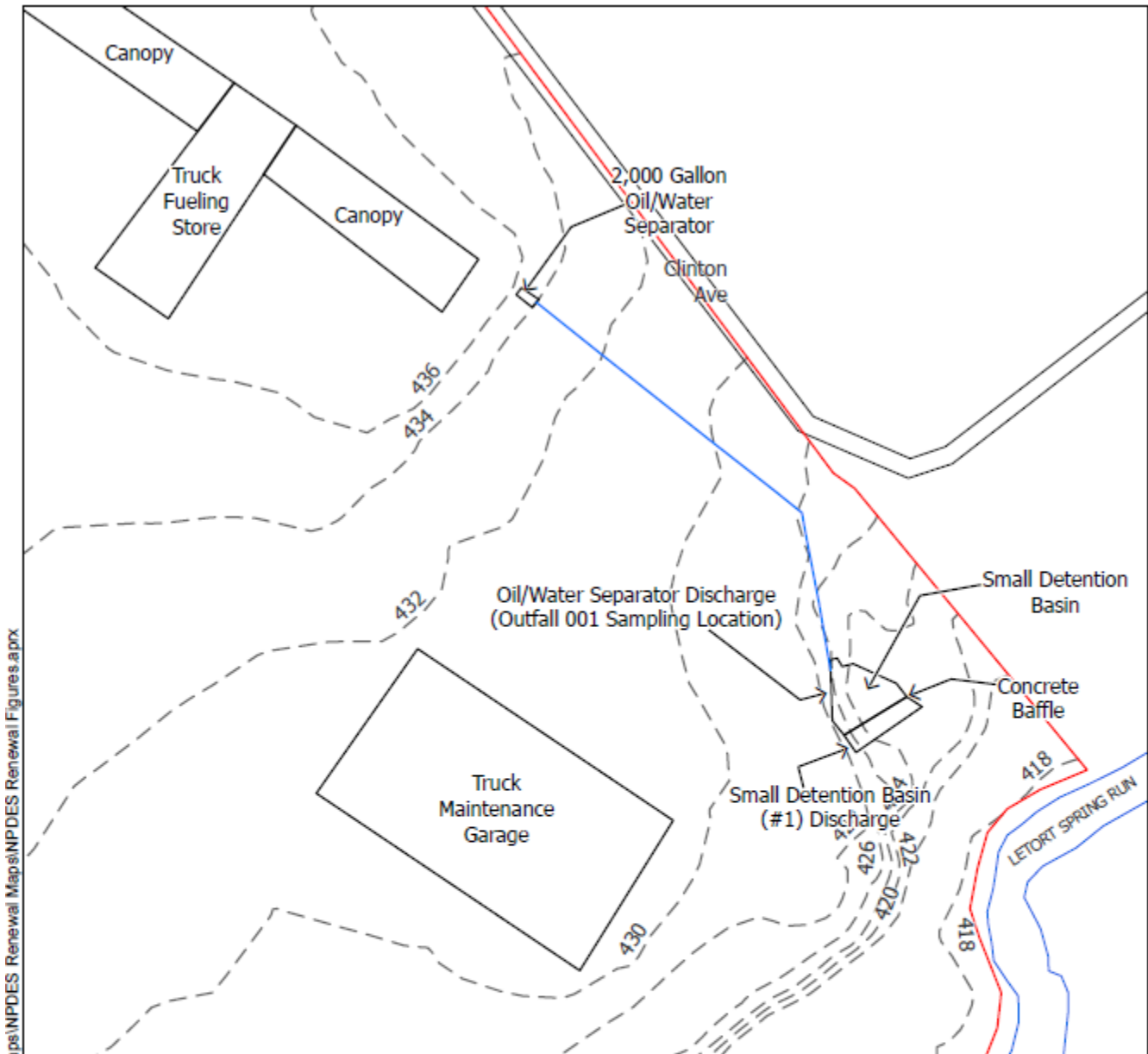
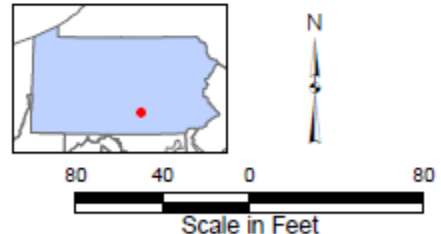


Figure 3. Outfall Location



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- Legend**
- Underground Oil/Water Separator Discharge Piping
  - - - Contours from PASDA
  - Site Feature
  - ▭ Site Boundary



**Notes:**  
 - Contours from PASDA dated 1/16/2020 file c33002130  
<https://www.pasda.psu.edu/download/usgs/LIDAR2017/Contours/South/>

<b>Petro Stopping Center Carlisle</b>		
1201 Harrisburg Pike, Carlisle, PA 17013		
 www.hydro-terra.com		NPDES Permit PA 803505 Renewal <b>Line Drawing</b>
Drawn:	TJR	04/14/23
Checked:	LPD	04/14/23
Approved:	NLB	04/14/23
figure:		<b>4</b>

Coordinate System: NAD 1983 2011 StatePlane Pennsylvania South FIPS 3702 Ft US

Figure 4. Outfall Location Line Drawing