



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

FACTSHEET (pursuant to NAC 445A.236)

Permittee Name: TA OPERATING, LLC DBA TRAVEL CENTERS OF AMERICA
24601 CENTER RIDGE RD STE 200
WESTLAKE, OH - 44145

Permit Number: NS0090016

Location: MILL CITY TRAVEL CENTER, PERSHING
6000 E. FRONTAGE STREET, MILL CITY, NV - 89418
LATITUDE: 40.693056, LONGITUDE: -118.055833
TOWNSHIP: T33N, RANGE: R35E, SECTION: S33

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Outfall City	Outfall State	Outfall Zip	Outfall County	Latitude	Longitude	Receiving Water
001	INFLUENT METER	Influent Structure		MILL CITY	NV	89418	PERSHING	40.691389	-118.058333	TREATMENT PLANT
002	EFFLUENT DISCHARGE	Surface Disposal Site		MILL CITY	NV	89418	PERSHING	40.691111	-118.059167	GROUNDWATER
003	5,000 GALLON OIL/WATER SEPARATOR	External Outfall		MILL CITY	NV	89418	PERSHING	40.694444	-118.056389	GROUNDWATER
MW1	MONITORING WELL 1	Monitoring Well	71637	MILL CITY	NV	89418	PERSHING	40.694090	-118.058890	GROUNDWATER
MW2	MONITORING WELL 2	Monitoring Well		MILL CITY	NV	89418	PERSHING	40.693290	-118.056420	GROUNDWATER
MW3	MONITORING WELL 3	Monitoring Well		MILL CITY	NV	89418	PERSHING	40.687150	-118.061840	GROUNDWATER
MW4	MONITORING WELL 4	Monitoring Well		MILL CITY	NV	89418	PERSHING	40.684020	-118.0644	GROUNDWATER

General:

Travel Centers of America own and operate an Ashbrook Simon-Hartley activated sludge package wastewater treatment plant at their Mill City Travel Center (MCTC) location. MCTC includes a vehicle fueling station, vehicle repair shop, convenience store, small casino and several restaurants. A 50-room on-site motel has been demolished and no longer contributes flow to the treatment plant. The package treatment plant is designed to treat and denitrify up to 0.0325 million gallons of wastewater per day. The treatment process includes nitrification in an anoxic chamber, aeration, post-anoxic denitrification, and settlement of suspended solids in a clarifier. Treated effluent is discharged to four (4) rapid infiltration basins. Prior to construction of the package treatment plant, MCTC operated a facultative pond system.

In addition to the treatment plant, MCTC operates a 5,000-gallon oil/water separator. This system discharges to its own dedicated percolation/evaporation ditch. In 1997, MCTC abandoned a 500-gallon modified stormwater collection sump.

Discharge Characteristics:

During the previous 12 month reporting period (January through December 2012), the following average discharge concentrations were reported:

1. 30-day average flow - 0.009 million gallons per day.
2. BOD - 4.1 mg/L
3. Total suspended solids - 9.7 mg/L.
4. Total nitrogen - 20.1 mg/L.
5. pH - 7.8 S.U.

Total nitrogen exceedances in the 3rd and 4th quarter of 2012 , 54 mg/L and 19 mg/L respectively, have been attributed to a broken blower drive belt which has since been repaired. During the term of the previous permit, which began on May 1, 2007, total nitrogen in the effluent has averaged 5.0 mg/L.

Receiving Water:

Receiving water is groundwater of the State. Elevated levels of total nitrogen in the monitoring wells have been attributed to leakage from the unlined facultative ponds that were used to treat wastewater prior to activation of the package treatment plant. Following completion of the treatment plant in 2006, total nitrogen levels in monitoring wells #1 and #4 have shown a downward trend from the reported high values of 32 mg/L in MW #1 during the first quarter of 2008, and 16 mg/L in MW #4 during the first quarter of 2007. Total nitrogen levels in MW #2 and MW #3 have remained fairly steady following reported high values of 18 mg/L in MW #2 and 19 mg/L in MW #3 during the first quarter of 2008. These high values indicate it may take many years of recharge and flushing to remove the accumulated nitrate discharged from the abandoned facultative pond system.

During the previous 12 month reporting period (January through December 2012) the following groundwater characteristics were reported:

MW #1:

1. Depth to groundwater - 93.9'
2. Total dissolved solids - 2175 mg/L
3. Chloride - 580 mg/L
4. Total nitrogen - 19.8 mg/L

MW #2:

1. Depth to groundwater - 90.7'
2. Total dissolved solids - 1975 mg/L
3. Chloride - 628 mg/L
4. Total nitrogen - 14.5 mg/L

MW #3:

1. Depth to groundwater - 94'
2. Total dissolved solids - 1900 mg/L
3. Chloride - 600 mg/L
4. Total nitrogen - 17 mg/L

MW #4:

1. Depth to groundwater - 67.7'
2. Total dissolved solids - 2450 mg/L
3. Chloride - 440 mg/L
4. Total nitrogen - 8.2 mg/L

Summary of Changes From Previous Permit:

The following permit changes have been made:

1. The requirement to monitor the amount of BOD and total suspended solids in the sewage influent has been removed from this permit.
2. The requirement to monitor the amount of nitrate as nitrogen in the treated effluent has been removed from this permit. The requirement to monitor the amount of total nitrogen has been retained.
3. The requirement to monitor the amount of nitrate as nitrogen in the monitoring wells has been removed from this permit. The requirement to monitor the amount of total nitrogen has been retained.
4. The requirement to monitor the oil/water separator discharge for barium has been removed from this permit as this constituent is not believed to be present.
5. The numerical concentration limits for discharges from the oil/water separator, other than TPH, have been replaced with a monitor and report requirement due to the lack of information regarding the treatment capabilities of these devices.
6. The TPH limit for discharges from the oil/water separator have been changed from 1.0 mg/L to 15 mg/L. This new limit is based on typical oil/water separator treatment capabilities.
7. The depth of effluent in each of the RIBs shall be measured and recorded in the facility logbook required by permit part B.PB.9.4. These measurements will no longer be required to be reported with the quarterly discharge monitoring reports.
8. Due to a new permit naming convention at NDEP, Bureau of Water Pollution Control, the permit ID has been changed from NEV90016 to NS0090016. This change does not reflect a change in the type of permit being issued.

Proposed Effluent Limitations:

The Division proposes the following permit limitations and monitoring requirements:

WWTP Discharge Limitations Table for Sample Location 001 (External Outfall) To Be Reported Monthly

Parameter	Discharge Limitations			Monitoring Requirements			
	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	30 Day Average	<= .025 Million Gallons per Day (Mgal/d)		Raw Sewage Influent	001	Continuous	METER
Flow rate	30 Day Maximum	<= .0325 Million Gallons per Day (Mgal/d)		Raw Sewage Influent	001	Continuous	METER

Groundwater Monitoring Wells Table for Sample Location Mw1 (Monitoring Well) To Be Reported Quarterly

Parameter	Discharge Limitations			Monitoring Requirements			
	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	S a m p l e Type
Depth to water level ft below landsurface	Value	M&R Feet (ft)		Groundwater	MW1	Quarterly	DISCRT
Chloride (as Cl)	Value		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Nitrogen, total	Value		<= 10 Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Solids, total dissolved	Value		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT

Groundwater Monitoring Wells Table for Sample Location Mw2 (Monitoring Well) To Be Reported Quarterly

Parameter	Discharge Limitations			Monitoring Requirements			
	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	S a m p l e Type
Depth to water level ft below landsurface	Value	M&R Feet (ft)		Groundwater	MW2	Quarterly	DISCRT
Chloride (as Cl)	Value		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Nitrogen, total	Value		<= 10 Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Solids, total dissolved	Value		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT

Groundwater Monitoring Wells Table for Sample Location Mw3 (Monitoring Well) To Be Reported Quarterly

Parameter	Discharge Limitations			Monitoring Requirements			
	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	S a m p l e Type
Depth to water level ft below landsurface	Value	M&R Feet (ft)		Groundwater	MW3	Quarterly	DISCRT
Chloride (as Cl)	Value		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Nitrogen, total	Value		<= 10 Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Solids, total dissolved	Value		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT

Groundwater Monitoring Wells Table for Sample Location Mw4 (Monitoring Well) To Be Reported Quarterly

Parameter	Discharge Limitations			Monitoring Requirements			
	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	S a m p l e Type
Depth to water level ft below landsurface	Value	M&R Feet (ft)		Groundwater	MW4	Quarterly	DISCRT
Chloride (as Cl)	Value		M&R Milligrams per Liter (mg/L)	Groundwater	MW4	Quarterly	DISCRT
Nitrogen, total	Value		<= 10 Milligrams per Liter (mg/L)	Groundwater	MW4	Quarterly	DISCRT
Solids, total dissolved	Value		M&R Milligrams per Liter (mg/L)	Groundwater	MW4	Quarterly	DISCRT

NS OTHER - Discharge Limitations Table for Sample Location 003 (External Outfall) To Be Reported Annually^[1]

Parameter	Discharge Limitations			Monitoring Requirements			
	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Arsenic, total (as As)	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Cadmium, total (as Cd)	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Chromium, total (as Cr)	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Lead, total (as Pb)	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Benzene	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Chlorobenzene	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Ethylbenzene	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Methylene chloride	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Tetrachloroethylene	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Toluene	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Trichloroethylene	Value		M&R Milligrams per Liter	Other Treatment, Process	004	Annual	DISCRT

NS OTHER - Discharge Limitations Table for Sample Location 003 (External Outfall) To Be Reported Annually^[1]

Parameter	Discharge Limitations			Monitoring Requirements			
	Base	Quantity	Concentration (mg/L)	Monitoring Loc	Sample Loc	Measurement Frequency	S a m p l e Type
Xylene	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Methyl tert-butyl ether	Value		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT
Hydrocarbons, total petroleum ^[2]	Value		<= 15 Milligrams per Liter (mg/L)	Other Treatment, Process Complete	004	Annual	DISCRT

Notes (NS OTHER - Discharge Limitations Table):

1. Obtain and analyze at least one (1) sample from the 5,000-gallon oil/water separator each year and report in the 4th quarter with the annual report.
2. Analyze and report the full range of purgeable and extractable hydrocarbons using method 8015B.

Ponds / Rapid Infiltration Basins for Sample Location 002 (Surface Disposal Site) To Be Reported Quarterly

Parameter	Discharge Limitations			Monitoring Requirements			
	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
BOD, 5-day	Value		<= 45 Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
Solids, total suspended	Value		<= 45 Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
Nitrogen, total	Value		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
pH, minimum	Minimum Value		>= 6 Standard Units (SU)	Effluent Gross	002	Quarterly	DISCRT
pH, maximum	Maximum Value		<= 9 Standard Units (SU)	Effluent Gross	002	Quarterly	DISCRT

Rationale for Permit Requirements:

Monitoring is required to ensure that the treatment plant capacity is not exceeded, to assess the level of treatment being provided, and to monitor groundwater quality.

Treatment Plant - BOD, TSS, total nitrogen and pH are typically required to be monitored by all wastewater treatment facilities. Limits are based on Secondary Treatment standards.

Monitoring Wells - Depth to water level, chloride, total nitrogen, and TDS are typically monitored at all facilities required to monitor groundwater. Limits are based on standard Division monitoring requirements.

Oil/Water Separator

- Arsenic, cadmium, chromium, lead, benzene, chlorobenzene, ethylbenzene, methylene chloride (dichloromethane), TCE, toluene, PCE, and xylene are listed as believed present in a previous permit application.

- MTBE and TPH are expected to be present at a vehicle fueling facility. TPH limit is based on general equipment treatment capabilities.

Special Conditions:

SA – Special Approvals / Conditions Table

Item #	Description
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Item #	Description
1	The oil/water separator shall be adequately posted and locked to avoid access.
2	The oil/water separator shall be pumped at least once each year. Contents removed shall be disposed of in a manner approved by the Division.
3	The depth of effluent in each RIB shall be measured weekly and recorded in the logbook required by permit part B.PB.9.4.
4	A minimum of 2 feet of freeboard shall be maintained in each of the RIBs.

Flow:

The Permittee has requested a 30-day average flow of 0.025 million gallons per day (MGD) and a daily maximum flow of 0.0325 MGD.

Corrective Action Sites:

There are two NDEP Bureau of Corrective Actions remediation sites located within one-mile of this facility. The NDEP case officer for these sites does not believe that the renewal of this permit will have a negative impact on the ongoing remediation activities.

Wellhead Protection Program:

This facility is located within the 1,000 foot buffer zone of one Drinking Water Protection Area, and within the 3,000 foot buffer zone of an additional Drinking Water Protection Area established for two public water supply wells that are ranked as highly vulnerable to VOCs. A Wellhead Protection Area has not been established for this area.

Schedule of Compliance:

SOC – Schedule of Compliance Table

Item #	Description	Due Date
1	The Permittee shall submit two (2) copies of an updated Operations and Maintenance (O&M) Manual for review and approval by the Division. The O&M Manual shall be prepared by a Nevada Registered Professional Engineer or other qualified person. If no updates or revisions are required, the Permittee shall submit a letter stating that there have been no changes to the previously approved O&M Manual. ^[1]	7/4/2013

Notes (Schedule of Compliance Table):

1. O&M Manuals prepared by Nevada Registered Professional Engineers must be signed and stamped in accordance with NAC 625.610.

Deliverable Schedule:

DLV– Deliverable Schedule for Reports, Plans, and Other Submittals

Item #	Description	Interval	First Scheduled Due Date
1	Discharge Monitoring Reports	Quarterly	7/28/2013
2	Annual Reports	Annually	1/28/2014

Procedures for Public Comment:

The Notice of the Division's intent to reissue a permit authorizing the facility to discharge to groundwater of

the State of Nevada subject to the conditions contained within the permit, is being sent to the **Reno Gazette Journal and , Humboldt Sun** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing until 5:00 P.M. **6/24/2013** , a period of 30 days following the date of the public notice. The comment period can be extended at the discretion of the Administrator.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator of EPA Region IX or any interested agency, person or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted. Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determined to be appropriate. All public hearings must be conducted to accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.650.

Proposed Determination:

The Division has made the tentative determination to issue / re-issue the proposed 5-year permit.

Prepared by: **Arthur Marr III**

Date: **3/26/2013**

Title: **P.E.**