Environmental Health and Safety

Environmental Compliance



Construction Stormwater Runoff at Texas A&M



Construction Activities & Permit Requirements

Texas A&M's topography is constantly changing by expanding construction projects. Construction activities include any soil disturbance: clearing, grading, and excavation. Stormwater runoff from construction activities moves across surfaces picking up trash, debris, and pollutants such as sediment; the most common source of water impairment.

These construction activities defined in terms of small, a site of 1-5 acres, and large, a site of 5 acres or greater. The Texas Commission on Environmental Quality (TCEQ) requires full permit coverage for any site over one acre. Full permit coverage taking form as a construction general permit, requires a prepared and implemented Stormwater Pollution Prevention Plan (SWPPP), submittal of a Notice of Intent (NOI) to the TCEO, the NOI must be visibly posted for the general public with the construction site notice, and a copy of both the NOI and SWPPP must be submitted to the Municipal Separate Storm Sewer System (MS4) permit holder for approval.

Stormwater Pollution Prevention Plans

Stormwater Pollution Prevention Plans are site specific, written documents identifying potential sources of stormwater pollution for a specified construction site. Reduction of pollutants are often achieved by controlling the volume of stormwater runoff. The plan identifies procedures the operator will implement to comply with the terms and conditions of the construction general permit. Failure to implement a SWPPP could result in significant fines from TCEQ and EPA agencies. Therefore it is pertinent that Texas A&M and construction contractors develop a SWPPP to address specific conditions, reflecting the reality of the changing site. SWPPP parameters should include, but are not limited to:

- 1. General location map
- 2. Detailed site map
- 3. Best management practices (BMPs)
- 4. Perimeter controls
- 5. Maintenance
- 6. Inspection Logs

The detailed site map shows drainage patterns, surface waters, locations of stormwater discharges – curb & grate inlets, vehicle wash areas, construction entrances and exits, and locations of possible pollutants; chemical storage, concrete washout areas, portable toilets, and disposal areas.

BMPs are properly selected, installed, and maintained control measures used to minimize pollution in runoff. These could include, but are not limited to: inlet protection barriers, silt fencing, hay socks, swales, addition of bull rock at construction exits, and vehicle wash stations.

Maintenance requirements are usually indicated through an inspection process – either every 7 days or every 14 days and concurrent within 24 hours of a rain event. All erosion and sediment control measures found inoperable must be amended prior to the next anticipated storm event or specified by the MS4.

Illicit Discharges

Illicit discharge is defined as any discharge to a MS4 that is not comprised solely of stormwater or authorized by a permit. Illicit discharges are considered 'illicit' because MS4s are not designed to accept, process, or discharge non-stormwater wastes. The result is untreated discharges that contribute high levels of pollutants to receiving waterbodies.

Texas A&M is currently composing a stormwater master plan to survey potential deficiencies in the campus' storm system. In concurrence with the master plan, the university utilizes public education, semi-annual outfall inspections, and the help of citizen reporting efforts to eliminate illicit discharges, including those from construction activities.

For more information on Texas A&M's construction permit requirements, stormwater pollution prevention plans, and illicit discharges, contact Environmental Health & Safety at 979-845-2132. For after hours service, please contact the Communications Center at 979-845-4311.

For general TCEQ and EPA construction stormwater information, you can click the following links:

- <u>EPA Stormwater Pollution</u> <u>Prevention Guide</u>
- <u>TCEQ Construction Stormwater</u> <u>Discharges</u>