

Stormwater Pollution Prevention Plan (SWPPP) Support



Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

Stormwater runoff generated from rain and snowmelt can pick up pollutants like trash, chemicals, oils, and dirt/sediment that can cause significant harm to our rivers, lakes, streams and coastal waters. The National Pollutant Discharge Elimination Program (NPDES) of the federal Clean Water Act (CWA) requires construction sites, and industrial facilities with stormwater discharges to a municipal separate storm sewer system (MS4) or to waters of the United States, to obtain an NPDES stormwater permit. Most states are authorized to implement the stormwater NPDES permitting program. However, the EPA remains the permitting authority in a few states, territories, and on most land in Indian Country.

For many industrial facilities, a stormwater permit is required for discharges from collecting and conveying stormwater directly related to manufacturing, processing, or raw materials storage areas. For construction sites, a stormwater permit is required for construction site operators engaged in clearing, grading, and excavating activities that disturb one (1) acre or more of land. Facilities subject to stormwater permitting must develop and implement a Stormwater Pollution Prevention Plan (SWPPP) and apply for a permit to discharge stormwater that may be contaminated by construction or industrial activities.

The SWPPP should include:

- Identifying potential sources of stormwater pollution through a site evaluation and other site-specific information
- Describing practices and management controls to reduce pollutants in stormwater discharges
- Identifying procedures the operator will implement to comply with the terms and conditions of the stormwater permit

Industrial Stormwater Permitting Process and Permit Coverage

Determining whether an industrial facility operator is required to obtain an NPDES industrial stormwater permit is a three-step process:



Step 1

Determine whether the facility or site discharges to a municipal separate storm sewer system (MS4) or to waters of the United States. If it discharges to one or both, proceed to Step 2, otherwise no permit is needed.

Step 2

Determine if the facility's industrial activities are listed among the eleven categories of industrial activities found at 40 CFR 122.26(b)(14) or if the facility's SIC code falls within one of the sector/subsectors identified. If its activities are listed, proceed to Step 3, otherwise no permit is needed.

Step 3

Determine if the facility or site may qualify for the "No Exposure" exclusion.

If an industrial facility must obtain an NPDES permit, it may acquire either an individual permit or multi-sector general permit. EPA and state agencies with stormwater permitting jurisdiction, have developed general permits for stormwater discharges. The EPA version is called the Multi-Sector General Permit (MSGP). Most states have developed several different types of general stormwater permits applicable to specific types of facilities (e.g., Colorado has separate general stormwater permits for different types of mining activities and for non-extractive industries). Individual permit coverage for stormwater is more typical for facilities that have a NPDES direct discharge for process wastewaters. To obtain coverage under an industrial stormwater permit, the basic steps typically include the following:

- Develop a SWPPP
 - Specific SWPPP requirements will be listed in the permit

- or permit application instructions
- Complete the Notice of Intent (NOI)
 - Submit prior to initial discharge
 - May require a certification that activity will not impact endangered/threatened species
- Submit a Notice of Termination (NOT) after the discharge is eliminated or when the owner or operator changes

Note that coverage under a general permit will typically require the facility to reapply for coverage (file a new NOI) when the general permit is reissued. General permits are reissued at least every five years.

Construction Stormwater Permitting Process and Permit Coverage

A general permit is required for construction sites with stormwater permitting requirements. EPA and State agencies with stormwater permitting jurisdiction have developed general permits for construction stormwater discharges. The EPA version is called the 2017 Construction General Permit (CGP). A typical construction stormwater permit procedure is as follows:

- Prepare a Stormwater Pollution Prevention Plan (SWPPP)
 - SWPPP templates and examples are available on the EPA website
- File Notice of Intent (NOI) to be covered under the Construction General Permit (CGP)
- Follow state specific requirements
- Comply with the terms of the CGP and implement the SWPPP at the construction site
- After the site has been stabilized, file a Notice of Termination (NOT)
 - It is typically required that vegetative stabilization of an exposed portion of the site through the use of seed or planted vegetation achieves 70% or more of the density of coverage that was provided by vegetation prior to commencing earth disturbing activities
 - Facilities covered under the EPA's 2017 CGP are required to use the eNOI system to prepare and submit the NOT unless they receive approval from the EPA Regional Office to use a paper NOT

Trinity's SWPPP Services

Trinity has prepared NOIs and NPDES permit applications, developed SWPPPs, and assisted with plan revisions and program audits for a

wide variety of industrial and construction activities for over 30 years.

Why Choose Trinity

In short, there's no better choice for assessing and supporting your SWPP plans and other state-specific requirements. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

ISO 9001:2015 certified at our corporate office in Dallas, Texas

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