



STORM EVENTS

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ITD Quarterly Storm Water Newsletter

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Promoting Responsible Storm Water Management Practices throughout the Idaho Transportation Department

District 2 SWAT – Proactively Managing Stormwater Issues

At the beginning of 2008, ITD Headquarters called each District to share information compiled for the 2007 Annual Report required by the Consent Decree with EPA. Generally, the news was that significant stormwater management challenges continue to persist.

In response to the ongoing issues, the District 2 (D2) District Engineer (DE) called a meeting of all the key players who could impact construction stormwater management. During the roundtable discussion, the message was very clear to the D2 staff – “I’ll try harder” won’t cut it.” The DE was looking for concrete ways to address continued stormwater management issues. Since the group identified administrative issues as the primary challenge, they decided to form a group that would review the weekly 2802s. From this discussion, the D2 Stormwater Action Team, or SWAT, was born.

In February 2008, the first SWAT convened with the goal of proactively managing construction stormwater management issues -- and has been meeting ever since. The process is simple, yet effective. Each Friday morning at 7:30, the ADE and representatives from the residency, environmental, and maintenance engineer meet for one hour to review the week’s 2802s from across the District. The group looks for minor discrepancies (typically addressed during the meeting) but also identifies larger issues that may require a call to the project inspector for clarification. If appropriate, the group uses this time to identify any non-compliance that needs to be reported to EPA. All of this is done prior to the ADE signing inspection forms.

According to D2 staff involved in the weekly meetings, several key benefits have come from the SWAT. Examples include:

- Early identification of potential non-compliance each week helps meet the 5 day reporting deadline
- Tracking completion of action items helps meet the 5 day window for correcting all discrepancies
- The ADE can be confident that he’s signing accurate and complete 2802s

Based on recent compliance information, the SWAT is working. Incidents of non-compliance within D2 showed significant improvement in 2008. Preliminary 2009 information to date continues this trend. In fact, the SWAT has been so effective, D2 will now include Multi-Sector General Permit (industrial stormwater permit) discussions in the same weekly meeting.

The Low Erosivity Waiver . . . Can It Apply to Your Project?

There have been recent questions regarding the applicability of the Low Erosivity Waiver (LEW) as detailed in Appendix D of the Construction General Permit (CGP). If applicable, the LEW can waive the requirements of the CGP including the requirement to develop a detailed project SWPPP. However, the granting of a the waiver **DOES NOT WAIVE THE REQUIREMENT TO MANAGE POLLUTANTS!** State water quality standards would still apply with or without a LEW. To apply for the LEW, the following criteria must be met:

- The project’s total disturbed acreage must be less than 5 acres
- The project rainfall erosivity factor (‘R’ Value) must be less than 5 (see EPA’s R-Value Calculator at www.epa.gov/npdcs/stormwater/lew)
- Operator must certify to EPA that construction activity will occur only when the rainfall erosivity factor is less than 5

Please note that the following issues could directly impact the applicability of the waiver to your project:

- **Project Schedule:** If the dates of construction extend past the original completion date, this will increase your R-Value and may change the applicability of the LEW to your project (i.e. your R-Value could end up greater than 5).
- **Project Location:** Project’s located in southern Idaho have comparatively lower R-values that central and northern Idaho due to soil types and precipitation amounts.

Determining your eligibility for the LEW is done on a case by case basis and in close coordination with District staff. If you think your project might qualify for a LEW, please be sure to coordinate with the proper staff in Design, Construction, and Environmental.

For detailed information on LEW Requirements, please refer to Appendix D of the CGP.

Test Your Storm Water Management I.Q.:

1. True or False. SWPPPs must be made available to local environmental groups if they arrive on the project and request to view the SWPPP.
2. The new 2008 CGP requires that you must remove trapped sediment from a silt fence before the deposit reaches ___% of the above-ground height.
3. As defined by the CGP, what is the range of annual precipitation associated with a “semi-arid” area?
4. What does ‘MSGP’ stand for?

ITD STORM WATER FREQUENTLY ASKED QUESTIONS (FAQS)

Q1: If construction is complete for a specific project and the only remaining project item is to achieve final stabilization, do my inspection requirements change?

A1: Yes. Per CGP Part 4.B, you may reduce your inspection frequency to at least once every month if the entire site is temporarily stabilized. Please be certain to coordinate the decision on reducing inspection frequency with the appropriate staff including District Environmental staff.

Q2: I've been asked by several Contractors how ITD manages the development of Stormwater Pollution Prevention Plans (SWPPPs). Is there a document or web location that provides this information?

A2: Yes. The best place to direct the Contractor's attention would be the ITD Clean Water Act insert that appears in the construction documents. The insert is ITD's stormwater management specification and provides detail on stormwater management responsibilities, the role of the Contractor in stormwater management, how ITD handles the SWPPP development process, and many other stormwater management requirements associated with the CGP and the Consent Decree. Please note, like many other specifications, this document is evolving and being updated on a periodic basis. Please contact your District Environmental Staff to ensure the most recent version is being used.

Q3: Is it true that signage must be posted at the main entrance of ITD construction sites?

A3: Yes. Per CGP Part 5.11.B, a sign or notice must be posted conspicuously near the main entrance of the construction site. If displaying near the main entrance is infeasible, the notice can be posted in a local building such as the town hall or public library. The site must have a copy of the completed NOI as submitted to EPA. If the location or name and telephone number for the contact person for scheduling SWPPP viewing times has changed from the original NOI, then updated info must be posted. For linear projects (i.e., road construction) the sign must be posted at a publicly accessible location near the active part of the construction project.

Quiz Answers:

1. False. Refer to CGP Part 5.11.C for list of entities that can request to view the project SWPPP.
2. Per CGP Part 3.6.D, the correct answer is 50%
3. Per CGP Appendix A, average annual precipitation of 10-20 inches.
4. MSGP stands for 'Multi-Sector General Permit' and is the permit associated with stormwater management at industrial sites.

BMP of the Quarter



BMP-3.12 VEGETATION/SEEDING (Temporary)

Refer to: ITD Standard Specifications, Sections 212 and 621

Temporary vegetation/seeding (cover crop) is the process of growing, from seed, a vegetative cover on disturbed areas for short-term erosion control during construction and maintenance soil-disturbing activities. The purpose of temporary vegetation/seeding is to stabilize slopes and surface areas by using rapid germinating and fast growing grasses or legumes, such as annual rye, cereal (barley, wheat, oats), or sterile hybrid grains. Added to approved hydro-mulch/tackifier/bonding fibers, vegetation/seeding can provide additional and cost-effective temporary soil stabilization and erosion control (see BMP-3.11, Surface/Soil Stabilization). Temporary vegetation can act as a nurse crop that when added to permanent seeding, can quickly provide an additional root system that helps stabilize and anchor disturbed surface areas subject to extensive erosion. Temporary vegetation allows permanent vegetation time to establish.

Application

Typical disturbed areas to consider for temporary vegetation are slides, washouts, slopes, guttering, topsoil stockpiles, temporary excavation or embankment areas, dikes, berms, dams, sediment trap basins (sides and top) and road banks. Temporary vegetation should be considered for any disturbed area where the potential for erosion may occur or where the disturbed area is required to receive a temporary soil stabilization BMP because of exposure to storm water runoff or wind after the last construction or maintenance activity (time limitation). Temporary vegetation can also be applied on surface areas prior to permanent vegetation to allow permanent seeding to take place at the appropriate times (season of seeding).

Limitations

Establishment of temporary vegetation depends on favorable temperatures and precipitation. The optimum time for establishing temporary vegetation is usually in the spring (January-May) or fall (September-December). Unless establishment water is used, temporary seeding in the summer months (June-August) is usually not effective and other temporary soil stabilizations and erosion control BMPs should be considered or relied upon. The same limitation applies to temporary seeding on frozen ground or in deep snow.