



**CLEAR  
WATER  
ALABAMA  
2022  
SEMINAR**

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# **NPDES Construction Stormwater Program: Common Issues Observed On Construction Sites**

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- Protection of groundwater and surface water quality (not quantity), and responsible management of potential environmental impacts
- Partnership with all affected parties to implement an environmentally sound “common sense” program that is best for Alabama
- Compliance with applicable federal and State laws and regulations

# ADEM

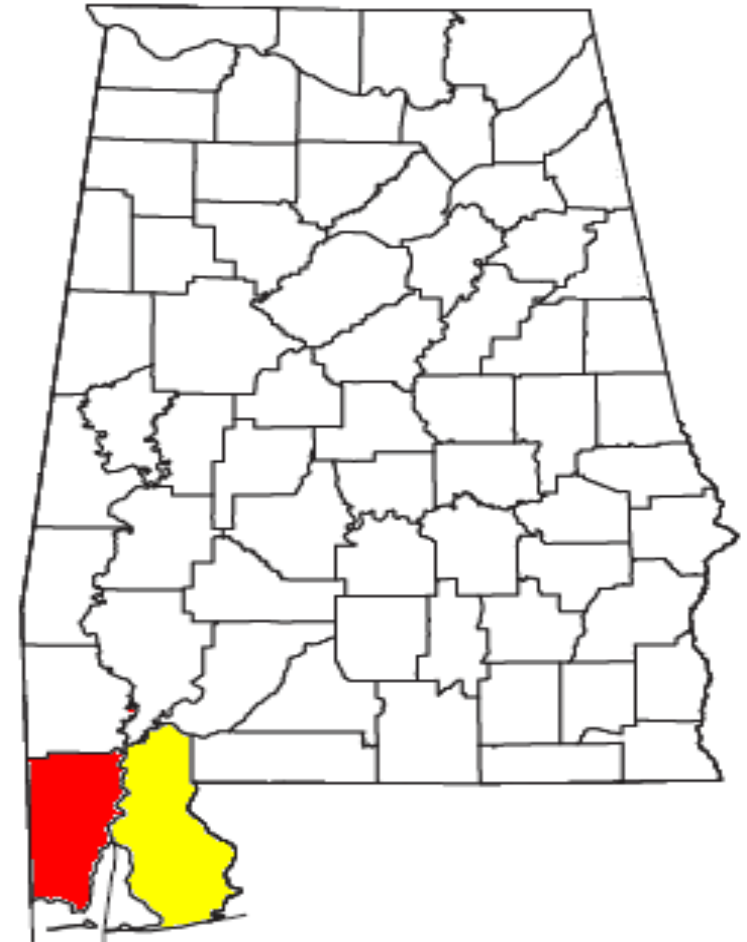
## Mobile Bay/Delta 1970's



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Active NPDES General Permits for  
CSW as of 9/1/2022:

- Mobile County: 271
- Baldwin County: 488





# Common issues at construction sites

- No permit
- Facility ID sign/ rain gauge not posted
- Construction exit pad
- BMPs not properly installed
- BMPs not properly maintained
- Failure to stabilize areas not worked in over 13 days
- Phasing stabilization
- Failure to maintain basin
- Buffer maintenance
- Sediment loss
- Housekeeping
- Turbid water entering a water of the state



- Construction Sites 1 acre and greater in size
- Construction sites less than 1 acre in size, if part of a larger common plan of development or sale
- Designated Construction
  - Less than 1 acre and determined by ADEM to be:
    - Significant contributor of pollution
    - Reasonable potential to cause or contribute to a Water Quality Standard violation

**When to apply for a permit?**

**BEFORE land disturbance begins on-site.**

Why?

- Greenfield fee
- Hire QCP and other consultants
- Develop BMP plan
- Protect vulnerable areas (wetlands, creeks, etc.)
- Enforcement







# ADEM

## ADEM ID sign and rain gauge



- Erosion Sediment Controls should be selected to meet/exceed the technical **standards** in the **AL Handbook for Erosion Control, Sediment Control, and Stormwater Management**
- Unless inconsistent with the Handbook, minimize erosion and control sediment for a **2yr, 24-hour storm event** (approx 4.5 to 6 inches for Mobile area)





- Effective BMPs must be implemented **prior to or concurrent** with disturbance activities
- BMPs must be maintained at all times until construction is complete and full reclamation and/or stormwater runoff quality remediation achieved
- Once construction is complete, please remove all temporary BMPs





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## BMPs not properly installed



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# BMPs not properly maintained



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# ADEM

# BMPs not properly maintained



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# ADEM

# BMPs not properly maintained-just 1 more



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## BMPs not properly maintained-result



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# Site not stabilized after 13 days without active construction





# Silt Fence With Vegetative Buffer





## Why is site stabilization for phasing important?

- Minimizes the area of exposed slopes, which reduces the chance of sediment loss and turbid water leaving the site.
- Proper stabilization helps prevent issues before moving to the next phase of construction.
  - Focus on erosion prevention
  - Permanently stabilize basin
  - Prevent confusion between permit holders



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## Site stabilization for phasing







- 25-foot natural riparian buffer zone is required when adjacent to all waters of the State
- Not primary sediment control measures
- Alternatives available but must achieve the sediment load reduction equivalent to a 25-foot undisturbed buffer
- Buffers need to be marked





### Remediation

- Approved method
- Labor intensive
- Costly
- Time























# Construction Exit Pad



## House keeping: litter control



- Please place all litter in roll-off dumpsters



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## No burning on CSW sites



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## House keeping: concrete wash





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Let's end on a good note: Its not all bad!



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## But it's not all bad



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# Inspection and Enforcement Related Contact Information

ADEM  
Mobile Field Office  
2204 Perimeter Drive  
Mobile, AL 36615  
Phone: 251-450-3400



- General program information links to the rule, forms, fee schedule, impaired water list, maps, contact information, the Alabama Handbook, etc.

[https://adem.alabama.gov/programs/water/  
constructionstormwater.cnt](https://adem.alabama.gov/programs/water/constructionstormwater.cnt)

- Most Common Compliance Issues at Construction Sites  
<https://www.youtube.com/watch?v=xG-SIIJ2Mgc>