

Stormwater Management Program

Purpose

To protect water quality and to ensure compliance with state and federal regulations, the Department of Environmental Health and Safety (EHS) administers the Storm Water Management Program.

Scope

The scope of the program pertains to the control of water and water pollutants such as excess nutrients, chemicals, and soil that enter storm drains and waterways from impermeable surfaces on campus. Natural events such as weather, or human-oriented events such as TU-related activities and actions from the surrounding community that result in waterborne pollutants or increased water flow/volume to the campus environment and facilities are relevant to the program.



Introduction

Stormwater and wastewater discharges are generated at Towson University (TU) through a number of sources and could ultimately enter "waters of the United States". Related sources may be considered wash water, wastewater, or stormwater dependent on origin. Relevant waters may originate from weather events which result in rain, snow, and/or ice, or they may derive from operations using piped water such as washing, irrigation, firefighting, or other activities, or incidents such as accidents, leaks, or ruptures. Related surfaces include roadways, sidewalks, other travel paths and paved surfaces, parking facilities, other buildings and facilities.

These discharges could affect the quality of the receiving water and are therefore controlled and regulated under the federal Clean Water Act (CWA) - National Pollutant Discharge Elimination System (NPDES) Program promulgated by the U.S. Environmental Protection Agency (USEPA) and the Maryland Department of the Environment (MDE). Under the NPDES Program, facilities which discharge pollutants from any point source into waters of the United States are required to obtain a permit. TU maintains three

NPDES Permits: an individual permit, which is specifically tailored to controlling the University's discharge of wastewater to surrounding surface waters; a general permit, which covers the discharge of stormwater runoff from land, pavement, building rooftops, and construction sites on campus; and a permit for discharges from stormwater associated with campus industrial activities.

This document provides guidance based on applicable regulations and the University's NPDES permits. The permits regulate and prohibit certain types of pollutants from entering stormwater that is discharged to waters of the United States.

Applicable Regulations

- 40 CFR Part 122 - EPA-Administered Permit Programs: National Pollutant Discharge Elimination System
- COMAR 26.08.04 - Water Pollution

Summary of Requirements

A. Background & Policy

In 1987, Congress amended the Clean Water Act and required the development of a stormwater permitting program by the USEPA. The agency had long required permits for the discharge of pollutants into surface and groundwater under its National Pollutant Discharge Elimination System (NPDES) permit program. This program was expanded to address stormwater issues. In Maryland, MDE is authorized to administer the NPDES permit program for the USEPA.

The regulatory program is designed to regulate the largest stormwater discharges. Such discharges include those associated with industrial activity from medium and large municipal separate storm sewer systems from entities already permitted under the NPDES program, and other discharges that contribute to a violation of water quality standards and are considered significant contributors of pollutants. Recognizing that the permitting of more than 100,000 entities would pose significant resource requirements, two types of permits were provided. General permits were established for the large majority of industrial dischargers. The regulations specify the types of discharges that may qualify for a General Permit. An entity must file a Notice of Intent (NOI) with the regulatory agency who will make a final determination regarding the issuance of a General Permit.

The General Permit contains standard requirements and limitations including the preparation of a Stormwater Pollution Prevention Plan. General Permits are available for industrial activities, construction activities, and specific industrial/commercial sectors. The university has two general permits, one, as previously indicated, is for discharges from stormwater associated with industrial activities.

In some cases, the agency may require that a regulated entity obtain an Individual Permit. To obtain such a permit, the entity must file a site-specific application that

identifies the discharge points, the receiving water body, the flow rates, and pollutant information. The regulatory agency will then review the information, establish site-specific pollutant discharge permits, and issue an Individual Permit. TU holds an Individual Permit that contains specific sampling, testing, and reporting requirements based upon the University's activities and discharge points. The permit also contains site-specific discharge limits for several chemical and physical parameters.

With respect to the Individual Permit, the University provides monitoring reports (DMR) to MDE who is responsible for enforcement activities. Significant discharge limits exist. Under the permit, the University may not discharge toxic or radioactive substances, sewage, nutrients, persistent foam, floating solids, and other pollutants which may cause a deleterious effect on water quality.

In October 2005, MDE authorized coverage under a "General Permit for Discharges from State and Federal Small Municipal Separate Storm Sewer Systems" for the University under Phase II of the NPDES. In January 2015, MDE also authorized coverage under a "General Discharge Permit for Stormwater Associated with Industrial Activities". The Permits incorporates minimum requirements that must be met in order for the University to have the authority to discharge stormwater.

B. Personnel Education and Outreach

Implement and maintain a personnel education and outreach program to help reduce the discharge of pollutants caused by stormwater runoff. It shall contain information about the impacts of stormwater discharges on receiving waters, why controlling these discharges is important, and what the personnel can do to reduce pollutants in stormwater runoff.

C. Public Involvement and Participation

In an effort to help reduce stormwater runoff from the campus, public participation, and investigating opportunities for interaction with students and neighboring residential communities is encouraged. This will be accomplished by promoting annual activities such as stream monitoring, streamside tree plantings, trash cleanup, and storm drain inlet stenciling.

D. Illicit Discharge Detection and Elimination

Develop, implement, and maintain a comprehensive program to identify and eliminate illicit storm drain system connections and non-stormwater discharges. This program shall contain elements to field screen storm drain system outfalls, develop a map showing the storm drain system, enforcement or penalty procedures, procedures to address spills and illegal dumping, and any other component necessary to ensure non-stormwater discharges to the storm drain system are either permitted by MDE under NPDES or eliminated.

To report an illicit discharge, please contact the TUPD at (410) 704-4444.

E. Construction Site Stormwater Runoff Control

Maryland has a statewide erosion and sediment control program that requires erosion and sediment control plans for all construction activity that disturbs greater than five thousand square feet of earth or 100 cubic yards of earth movement. Maryland regulations contain procedures for approving proposed construction drawings and erosion sediment control plans prior to the start of construction. TU relies on this qualifying local program to comply with this control measure.

F. Post-Construction Runoff Control

Maryland requires that stormwater management for new development and redevelopment be addressed for any proposed project that disturbs five-thousand square feet or more of earth. MDE is responsible for reviewing, approving, and enforcing Stormwater Management Plans for State and federal construction projects. MDE considers compliance with the State statute to satisfy this minimum control measure.

G. Pollution Prevention and Good Housekeeping

Implement and maintain pollution prevention and good housekeeping techniques to reduce pollutants from all TU operations. This minimum control shall include employee training to reduce pollutant discharges to the storm drain system, runoff controls at fleet and building maintenance facilities, and ensure all activities are properly permitted under NPDES or other State or federal water pollution control program.

H. Reporting

The University must provide MDE with monitoring reports based on sampling activities. Noncompliance with any permitted discharge limit must be reported to MDE within 24 hours of becoming aware of the noncompliance. A written report must be submitted within five calendar days.

I. Inspections

The University is required to inspect all oil-water separators, grease interceptors, stormwater outfalls, above and below ground retention ponds, grit traps, and other devices on a routine basis to ensure they are operating properly. Oil, trash, debris, and accumulated sediments must be removed before they exceed the capacity of the device.

J. Recordkeeping

Records must be maintained of all inspections, outreach activities, monitoring activities, illicit discharge, and laboratory analyses for a minimum period of three years.