



Quick facts on...

Soil Stockpiles, Borrow Areas, and Disposal Areas



- Current IDEM Construction Stormwater General Permit (CSGP) and Local Ordinance Requirements both require the submittal of information related to the location and management of proposed soil stockpiles, borrow areas, and disposal areas for construction projects that involve the disturbance of one or more acres of land.
- The information provided in this Stormwater Fact Sheet provides an overview of these requirements and what is expected of developers and builders regarding construction site soil management.

PRE-CONSTRUCTION ITEMS

REQUIREMENTS:

The construction plans (Grading Plan) and Stormwater Pollution Prevention Plan (SWPPP) must include:

- The location of all soil stockpiles and borrow areas.
- Information regarding any off-site borrow, stockpile, or disposal areas that are associated with a project site and under the control of the project site owner.
- Soil erosion and sediment control (SESC) Best Management Practices to manage any off-site borrow, stockpile, or disposal areas.

LOGISTICS:

Generally, the locations of stockpiles, borrow areas, and disposal areas are handled in the following ways:

- On-site within the project perimeter.
- Off-site at a location covered by the approved project SWPPP.
- At a commercially operated facility that has its own SWPPP.

PLAN REVIEW:

As part of the local entity review process, the MS4 Stormwater Permit Application Grading Plan identifies the following specific review items:

- Location of all soil stockpiles and borrow areas.
- Information regarding any off-site borrow, stockpile, or disposal areas. **NOTE: The failure to properly identify and disclose off-site areas can result in a Violation Notice during construction.**

CONSTRUCTION ITEMS

STOCKPILE SWPPP ITEMS:

SESC Best Management Practices related to soil stockpiles typically include:

- Temporary vegetation of the stockpile.
- Perimeter control along the downslope side of the stockpile. Note: if perimeter controls are temporarily moved to access a stockpile, ensure the perimeter controls are properly reinstalled.
- Work the edges of the stockpile towards the center to maintain as much vegetation on the stockpile as possible. {See photo on page 2 of this Fact Sheet.}

SELF-MONITORING RELATED TO STOCKPILES:

The project site owner must establish a SWPPP self-monitoring program (after a rain of 0.5" or greater and at a minimum of once per week) conducted by a trained individual; and this includes inspecting stockpiles:

- Are stockpiles located in the approved areas?
- Are stockpiles properly protected with vegetation and perimeter controls?

CHANGES TO STOCKPILING PLANS:

If a stockpile location is desired to be changed to outside the project limits of the approved SWPPP:

- The proposed changes must be filed with and approved by the local entity prior to land disturbance involved with the proposed change.
- The submittal of a revised SWPPP and an Amended or New CSGP Notice of Intent may also be required.

FREQUENTLY ASKED QUESTIONS

On Construction Site Soil Management



Q: Who is responsible to inform the local entity regarding the temporary stockpiling and ultimate disposal of spoils? A: Current IDEM CSGP and Local Ordinance Requirements are both very clear: during the SWPPP submittal and construction phase, the project site owner must provide “information related to all off-site borrow sites, disposal areas, and staging areas that are off-site.” The information (e.g. location of each activity) must be included in the SWPPP, when known at the time of submittal and in the project management log. This requirement is without regard to the jurisdiction of the off-site location.

Q: As I began land clearing activities and soil stockpiling on a permitted site, an adjacent property owner requested some spoils to fill in low spots on his property which is outside the boundary of my permitted project limits. Can I provide spoils to the adjacent owner? A: No, not without amending the project SWPPP to expand the project limits of land disturbance and receiving approval from the local entity. The amended SWPPP must address the following items:

- The spoils will not be placed in a location that will fill in wetlands or ‘waters’ of the State
- The spoils will not be placed in a floodway.
- The spoils will not be placed within an existing 50-foot natural buffer adjacent to a ‘waters’ of the State
- If the adjacent area is within a different MS4 jurisdiction, the other MS4 must be contacted and a separate MS4/IDEM CSGP Permit may be required.
- Any other types of permits that are required are obtained (road cut permit, fill permit, etc.)

Q: Who is responsible for updating a SWPPP for stockpile changes?

A: For minor SWPPP revisions within the approved project limits, identifying changes via ‘red-lining’ a record copy of the SWPPP and documenting the changes in a project management log is an accepted practice. If changes are proposed that go beyond the approved project limits and are less than an acre, the project site owner must inform the local entity and submit an Amended CSGP Notice of Intent to IDEM prior to initiating land disturbance involving the change. For changes that result in more than an acre of additional land disturbance, site owners must obtain separate permit coverage for the additional area of disturbance.

Q: What type of regulated facility can accept spoils from an active construction site?

A: A commercially operated soil handling facility with its own stormwater discharge permit can accept spoils.

Q: Can spoils be moved to another site that has its own approved SWPPP and permit coverage under the IDEM CSGP?

A: Yes, provided that the local entity has been informed in advance and regarding the proposed transfer of spoils and that the location of the spoil disposal site is documented in the project management log.

