



Streamlining the DEP SWPPP Submission and Review Process

Architecture & Engineering

The below bullet points are notes taken from an SCA/DEP meeting held on January 21, 2025, to discuss potential ways to improve the SWPPP review and approval process, so as to reduce the number of SWPPP submissions to DEP. The USWR Manual has the requirements for the SWPPP submissions, but these bullet points are some of the typical items found to not be addressed in submissions, which has prolonged the approval process.

- The importance of the SWPPP narrative cannot be overemphasized and may be the most important item to improve upon to reduce the number of SWPPP resubmissions. DEP has a hierarchy of green infrastructure and will always want to use Tier 1 practices first, then Tier 2, and then those of lower hierarchy. The SWPPP narrative must clearly indicate the constraints preventing the use of each of the Tier 1 practices, and then the constraints of using each of the Tier 2 practices, and so forth. The constraints must be demonstrative, not indicative of a preference without technical back-up.
 - Site constraints that may be unique to the SCA (e.g., play roof vs green roof) must be fully explained and described in the narrative.
 - Lack of soil percolation in the upper say 10 feet when there is soil below that meets the infiltration requirement is not an excuse to not use a practice, since local excavation and replacement of the bad soil is acceptable when using drywells. It is noted that cost is not a constraint to the DEP.
 - Hydrodynamic separators are not an approved water quality treatment, as they really don't treat the water at the same level as some of the proprietary systems and thus should never be used.
- The proposed Erosion and Sedimentation Controls (ESC) must be consistent across the drawings, narrative and application. The DEP indicated that there are often inconsistencies between the documents that will result in the rejection of an application. Often the DEP needs to object because the narrative is not clear as to which ESC practice applies to each location at the site.
- It is imperative that designers review their SWPPP submission holistically prior to DEP submission to ensure there is agreement across the documents.
- Designers always have an opportunity to meet with DEP. The first meeting should be the Pre-application and include the results of the feasibility testing and recent survey. These meetings should be used to iron out the design approach.
- Feasibility soil testing can be used towards SWPPP application provided the testing procedures are of the same quality as the design level tests. DEP may accept feasibility testing as evidence of non-permeability provided there are sufficient number of tests (i.e., a single test does not prove the site is impermeable since they believe the character of the soil can change throughout the site).
- The feasibility and design testing procedures must be clearly described in SWPPP documents (e.g., potable water and steel casing was used to drill to the infiltration test depth, permeability testing was then performed until three similar flow rates were obtained. Upon completion of the infiltration testing, the borehole was advanced using drilling mud and STP testing was performed to the termination depth of the borehole.)
- Feasibility testing should always consider required setbacks, green infrastructure locations and other site features.