BMP C250: Construction Stormwater Chemical Treatment

**Purpose**

This BMP applies when using stormwater chemicals in batch treatment or flow-through treatment.

Turbidity is difficult to control once fine particles are suspended in stormwater runoff from a construction site. Sedimentation ponds are effective at removing larger particulate matter by gravity settling, but are ineffective at removing smaller particulates such as clay and fine silt.

Traditional erosion and sediment control BMPs may not be adequate to ensure compliance with the water quality standards for turbidity in receiving water.

Chemical treatment can reliably provide exceptional reductions of turbidity and associated pollutants. Chemical treatment may be required to meet turbidity stormwater discharge requirements, especially when construction is to proceed through the wet season.

**Conditions of Use**

Formal written approval from Ecology is required for the use of chemical treatment regardless of site size. The Local Permitting Authority may also require review and approval.

When approved, the chemical treatment systems must be included in the Construction Stormwater Pollution Prevention Plan (SWPPP).

**Design and Installation Specifications**

See Appendix C for background information on chemical treatment.

**Criteria for Chemical Treatment Product Use:** Chemically treated stormwater discharged from construction sites must be nontoxic to aquatic organisms. The Chemical Technology Assessment Protocol (CTAPE) must be used to evaluate chemicals proposed for stormwater treatment. Only chemicals approved by Ecology under the CTAPE may be used for stormwater treatment. The approved chemicals, their allowable application techniques (batch treatment or flow-through treatment), allowable application rates, and conditions of use can be found at the Department of Ecology Emerging Technologies website: [http://www.ecy.wa.gov/programs/wq/stormwater/newtech/technologies.html](http://www.ecy.wa.gov/programs/wq/stormwater/newtech/technologies.html).

**Treatment System Design Considerations:** The design and operation of a chemical treatment system should take into consideration the factors that determine optimum, cost-effective performance. It is important to recognize the following:

- Only Ecology approved chemicals may be used and must follow approved dose rate.
- The pH of the stormwater must be in the proper range for the polymers to be effective, which is typically 6.5 to 8.5.
• The coagulant must be mixed rapidly into the water to ensure proper dispersion.

• A floculation step is important to increase the rate of settling, to produce the lowest turbidity, and to keep the dosage rate as low as possible.

• Too little energy input into the water during the floculation phase results in flocs that are too small and/or insufficiently dense. Too much energy can rapidly destroy floc as it is formed.

• Care must be taken in the design of the withdrawal system to minimize outflow velocities and to prevent floc discharge. Discharge from a batch treatment system should be directed through a physical filter such as a vegetated swale that would catch any unintended floc discharge. Currently, flow-through systems always discharge through the chemically enhanced sand filtration system.

• System discharge rates must take into account downstream conveyance integrity.

**Polymer Batch Treatment Process Description:**

A batch chemical treatment system consists of the stormwater collection system (either temporary diversion or the permanent site drainage system), a storage pond, pumps, a chemical feed system, treatment cells, and interconnecting piping.

The batch treatment system shall use a minimum of two lined treatment cells in addition to an untreated stormwater storage pond. Multiple treatment cells allow for clarification of treated water while other cells are being filled or emptied. Treatment cells may be ponds or tanks. Ponds with constructed earthen embankments greater than six feet high or which impound more than 10 acre-feet require special engineering analyses. The Ecology Dam Safety Section has specific design criteria for dams in Washington State (see [http://www.ecy.wa.gov/programs/wr/dams/GuidanceDocs.html](http://www.ecy.wa.gov/programs/wr/dams/GuidanceDocs.html)).

Stormwater is collected at interception point(s) on the site and is diverted by gravity or by pumping to an untreated stormwater storage pond or other untreated stormwater holding area. The stormwater is stored until treatment occurs. It is important that the holding pond be large enough to provide adequate storage.

The first step in the treatment sequence is to check the pH of the stormwater in the untreated stormwater storage pond. The pH is adjusted by the application of carbon dioxide or a base until the stormwater in the storage pond is within the desired pH range, 6.5 to 8.5. When used, carbon dioxide is added immediately downstream of the transfer pump. Typically sodium bicarbonate (baking soda) is used as a base, although other bases may be used. When needed, base is
added directly to the untreated stormwater storage pond. The stormwater is recirculated with the treatment pump to provide mixing in the storage pond. Initial pH adjustments should be based on daily bench tests. Further pH adjustments can be made at any point in the process.

Once the stormwater is within the desired pH range (dependant on polymer being used), the stormwater is pumped from the untreated stormwater storage pond to a treatment cell as polymer is added. The polymer is added upstream of the pump to facilitate rapid mixing.

After polymer addition, the water is kept in a lined treatment cell for clarification of the sediment-floc. In a batch mode process, clarification typically takes from 30 minutes to several hours. Prior to discharge samples are withdrawn for analysis of pH, flocculent chemical concentration, and turbidity. If both are acceptable, the treated water is discharged.

Several configurations have been developed to withdraw treated water from the treatment cell. The original configuration is a device that withdraws the treated water from just beneath the water surface using a float with adjustable struts that prevent the float from settling on the cell bottom. This reduces the possibility of picking up sediment-floc from the bottom of the pond. The struts are usually set at a minimum clearance of about 12 inches; that is, the float will come within 12 inches of the bottom of the cell. Other systems have used vertical guides or cables which constrain the float, allowing it to drift up and down with the water level.

More recent designs have an H-shaped array of pipes, set on the horizontal.

This scheme provides for withdrawal from four points rather than one. This configuration reduces the likelihood of sucking settled solids from the bottom. It also reduces the tendency for a vortex to form. Inlet diffusers, a long floating or fixed pipe with many small holes in it, are also an option.

Safety is a primary concern. Design should consider the hazards associated with operations, such as sampling. Facilities should be designed to reduce slip hazards and drowning. Tanks and ponds should have life rings, ladders, or steps extending from the bottom to the top.

**Polymer Batch Treatment Process Description:**

At a minimum, a flow-through chemical treatment system consists of the stormwater collection system (either temporary diversion or the permanent site drainage system), an untreated stormwater storage pond, and the chemically enhanced sand filtration system.

Stormwater is collected at interception point(s) on the site and is
diverted by gravity or by pumping to an untreated stormwater storage pond or other untreated stormwater holding area. The stormwater is stored until treatment occurs. It is important that the holding pond be large enough to provide adequate storage.

Stormwater is then pumped from the untreated stormwater storage pond to the chemically enhanced sand filtration system where polymer is added. Adjustments to pH may be necessary before chemical addition. The sand filtration system continually monitors the stormwater for turbidity and pH. If the discharge water is ever out of an acceptable range for turbidity or pH, the water is recycled to the untreated stormwater pond where it can be retreated.

*For batch treatment and flow-through treatment*, the following equipment should be located in a lockable shed:

- The chemical injector.
- Secondary containment for acid, caustic, buffering compound, and treatment chemical.
- Emergency shower and eyewash.
- Monitoring equipment which consists of a pH meter and a turbidimeter.

**System Sizing:**

Certain sites are required to implement flow control for the developed sites. These sites must also control stormwater release rates during construction. Generally, these are sites that discharge stormwater directly, or indirectly, through a conveyance system, into a fresh water. System sizing is dependent on flow control requirements.

**Sizing Criteria for Batch Treatment Systems for Flow Control Exempt Water Bodies:**

The total volume of the untreated stormwater storage pond and treatment ponds or tanks must be large enough to treat stormwater that is produced during multiple day storm events. It is recommended that at a minimum the untreated stormwater storage pond be sized to hold 1.5 times the runoff volume of the 10-year, 24-hour storm event. Bypass should be provided around the chemical treatment system to accommodate extreme storm events. Runoff volume shall be calculated using the methods presented in Volume 3, Chapter 2. Worst-case land cover conditions (i.e., producing the most runoff) should be used for analyses (in most cases, this would be the land cover conditions just prior to final landscaping).

Primary settling should be encouraged in the untreated stormwater storage pond. A forebay with access for maintenance may be beneficial.
There are two opposing considerations in sizing the treatment cells. A larger cell is able to treat a larger volume of water each time a batch is processed. However, the larger the cell the longer the time required to empty the cell. A larger cell may also be less effective at flocculation and therefore require a longer settling time. The simplest approach to sizing the treatment cell is to multiply the allowable discharge flow rate times the desired drawdown time. A 4-hour drawdown time allows one batch per cell per 8-hour work period, given 1 hour of flocculation followed by two hours of settling.

If the discharge is directly to a flow control exempt receiving water listed in Appendix I-E of Volume I or to an infiltration system, there is no discharge flow limit.

Ponds sized for flow control water bodies must at a minimum meet the sizing criteria for flow control exempt waters.

**Sizing Criteria for Flow-Through Treatment Systems for Flow Control Exempt Water Bodies:**

When sizing storage ponds or tanks for flow-through systems for flow control exempt water bodies, the treatment system capacity should be a factor. The untreated stormwater storage pond or tank should be sized to hold 1.5 times the runoff volume of the 10-year, 24-hour storm event minus the treatment system flowrate for an 8-hour period. For a chitosan-enhanced sand filtration system, the treatment system flowrate should be sized using a hydraulic loading rate between 6-8 gpm/ft². Other hydraulic loading rates may be more appropriate for other systems. Bypass should be provided around the chemical treatment system to accommodate extreme storms. Runoff volume shall be calculated using the methods presented in Volume 3, Chapter 2. Worst-case land cover conditions (i.e., producing the most runoff) should be used for analyses (in most cases, this would be the land cover conditions just prior to final landscaping).

**Sizing Criteria for Flow Control Water Bodies:**

Sites that must implement flow control for the developed site condition must also control stormwater release rates during construction.

Construction site stormwater discharges shall not exceed the discharge durations of the pre-developed condition for the range of pre-developed discharge rates from ½ of the 2-year flow through the 10-year flow as predicted by an approved continuous runoff model. The pre-developed condition to be matched shall be the land cover condition immediately prior to the development project. This restriction on release rates can affect the size of the storage pond and treatment cells.

The following is how WWHM can be used to determine the release rates from the chemical treatment systems:
1. Determine the pre-developed flow durations to be matched by entering the existing land use area under the “Pre-developed” scenario in WWHM. The default flow range is from $\frac{1}{2}$ of the 2-year flow through the 10-year flow.

2. Enter the post developed land use area in the “Developed Unmitigated” scenario in WWHM.

3. Copy the land use information from the “Developed Unmitigated” to “Developed Mitigated” scenario.

4. While in the “Developed Mitigated” scenario, add a pond element under the basin element containing the post-developed land use areas. This pond element represents information on the available untreated stormwater storage and discharge from the chemical treatment system. In cases where the discharge from the chemical treatment system is controlled by a pump, a stage/storage/discharge (SSD) table representing the pond must be generated outside WWHM and imported into WWHM. WWHM can route the runoff from the post-developed condition through this SSD table (the pond) and determine compliance with the flow duration standard. This would be an iterative design procedure where if the initial SSD table proved to be inadequate, the designer would have to modify the SSD table outside WWHM and re-import in WWHM and route the runoff through it again. The iteration will continue until a pond that complies with the flow duration standard is correctly sized.

Notes on SSD table characteristics:

- The pump discharge rate would likely be initially set at just below $\frac{1}{2}$ of the 2-year flow from the pre-developed condition. As runoff coming into the untreated stormwater storage pond increases and the available untreated stormwater storage volume gets used up, it would be necessary to increase the pump discharge rate above $\frac{1}{2}$ of the 2-year. The increase(s) above $\frac{1}{2}$ of the 2-year must be such that they provide some relief to the untreated stormwater storage needs but at the same time will not cause violations of the flow duration standard at the higher flows. The final design SSD table will identify the appropriate pumping rates and the corresponding stage and storages.

- When building such a flow control system, the design must ensure that any automatic adjustments to the pumping rates will be as a result of changes to the available storage in accordance with the final design SSD table.

5. It should be noted that the above procedures would be used to meet the flow control requirements. The chemical treatment system must be able to meet the runoff treatment requirements. It is likely that the discharge flow rate of $\frac{1}{2}$ of the 2-year or more may exceed the treatment capacity of the system. If that is the case, the untreated
stormwater discharge rate(s) (i.e., influent to the treatment system) must be reduced to allow proper treatment. Any reduction in the flows would likely result in the need for a larger untreated stormwater storage volume.

If the discharge is to a municipal storm drainage system, the allowable discharge rate may be limited by the capacity of the public system. It may be necessary to clean the municipal storm drainage system prior to the start of the discharge to prevent scouring solids from the drainage system. If the municipal storm drainage system discharges to a water body not on the flow control exempt list, the project site is subject to flow control requirements. Obtain permission from the owner of the collection system before discharging to it.

If system design does not allow you to discharge at the slower rates as described above and if the site has a retention or detention pond that will serve the planned development, the discharge from the treatment system may be directed to the permanent retention/detention pond to comply with the flow control requirement. In this case, the untreated stormwater storage pond and treatment system will be sized according to the sizing criteria for flow-through treatment systems for flow control exempt water bodies described earlier except all discharge (water passing through the treatment system and stormwater bypassing the treatment system) will be directed into the permanent retention/detention pond. If site constraints make locating the untreated stormwater storage pond difficult, the permanent retention/detention pond may be divided to serve as the untreated stormwater storage pond and the post-treatment flow control pond. A berm or barrier must be used in this case so the untreated water does not mix with the treated water. Both untreated stormwater storage requirements, and adequate post-treatment flow control must be achieved. The post-treatment flow control pond’s revised dimensions must be entered into the WWHM and the WWHM must be run to confirm compliance with the flow control requirement.

**Maintenance Standards**

**Monitoring:** At a minimum, the following monitoring shall be conducted. Test results shall be recorded on a daily log kept on site. Additional testing may be required by the NPDES permit based on site conditions.

**Operational Monitoring:**

- Total volume treated and discharged.
- Flow must be continuously monitored and recorded at not greater than 15-minute intervals.
- Type and amount of chemical used for pH adjustment.
- Amount of polymer used for treatment.
- Settling time.
Compliance Monitoring:

- Influent and effluent pH, flocculent chemical concentration, and turbidity must be continuously monitored and recorded at not greater than 15-minute intervals. pH and turbidity of the receiving water.

Biomonitoring:

Treated stormwater must be non-toxic to aquatic organisms. Treated stormwater must be tested for aquatic toxicity or residual chemicals. Frequency of biomonitoring will be determined by Ecology.

Residual chemical tests must be approved by Ecology prior to their use.

If testing treated stormwater for aquatic toxicity, you must test for acute (lethal) toxicity. Bioassays shall be conducted by a laboratory accredited by Ecology, unless otherwise approved by Ecology. Acute toxicity tests shall be conducted per the CTAPE protocol.

Discharge Compliance: Prior to discharge, treated stormwater must be sampled and tested for compliance with pH, flocculent chemical concentration, and turbidity limits. These limits may be established by the Construction Stormwater General Permit or a site-specific discharge permit. Sampling and testing for other pollutants may also be necessary at some sites. pH must be within the range of 6.5 to 8.5 standard units and not cause a change in the pH of the receiving water of more than 0.2 standard units. Treated stormwater samples and measurements shall be taken from the discharge pipe or another location representative of the nature of the treated stormwater discharge. Samples used for determining compliance with the water quality standards in the receiving water shall not be taken from the treatment pond prior to decanting. Compliance with the water quality standards is determined in the receiving water.

Operator Training: Each contractor who intends to use chemical treatment shall be trained by an experienced contractor. Each site using chemical treatment must have an operator trained and certified by an organization approved by Ecology.

Standard BMPs: Surface stabilization BMPs should be implemented on site to prevent significant erosion. All sites shall use a truck wheel wash to prevent tracking of sediment off site.

Sediment Removal and Disposal:

- Sediment shall be removed from the storage or treatment cells as necessary. Typically, sediment removal is required at least once during a wet season and at the decommissioning of the cells. Sediment remaining in the cells between batches may enhance the settling process and reduce the required chemical dosage.
- Sediment that is known to be non-toxic may be incorporated into the site away from drainages.