

ALTERNATIVE E&S AND PCSM BMPs

Revised, December 13, 2018
Version 1.3

Introduction

The Pennsylvania Department of Environmental Protection (DEP) and delegated county conservation districts (CCDs) periodically receive requests for alternative best management practices (BMPs) as part of applications or Notices of Intent (NOIs) for erosion and sediment control (E&S) permits and NPDES permits under 25 Pa. Code Chapter 102. E&S BMPs and design standards are identified in DEP's *Erosion and Sediment Pollution Control Program Manual* ("E&S Manual") (363-2134-008). DEP's regulations at 25 Pa. Code §§ 102.4(b)(7) and 102.11(b) provide that DEP may approve alternative E&S BMPs (not identified in the E&S Manual). Post-construction stormwater management (PCSM) BMPs and design standards are identified in DEP's *Stormwater Best Management Practices Manual* ("Stormwater BMP Manual") (363-0300-002). DEP's regulations (25 Pa. Code § 102.11(b)) also recognize that DEP may approve alternative PCSM BMPs (not identified in the Stormwater BMP Manual).

The purpose of this document is to identify the alternative BMPs that have been reviewed by DEP and provide the results of that review. Applicants may utilize this information during the design and BMP selection phase of project development. If an alternative BMP in this document has been approved by DEP and is selected for an earth disturbance project, the reviewer of the permit application may accept the BMP as approved under Chapter 102 and no further review by DEP is necessary unless the reviewer believes the proposed BMP differs from the BMP described in this document.

This document will be updated periodically as new alternative BMPs are reviewed. Note that all alternative BMPs reviewed by DEP are listed – both those that are approved and those that have been disapproved. There are three tables of BMPs in this document: 1) Approved Alternative E&S BMPs; 2) Disapproved Alternative E&S BMPs; and 3) Approved Alternative PCSM BMPs. The following describes the columns in each table:

- **Alternative BMP** – The general name of the alternative BMP.
- **Comments** – DEP's review comments on the alternative BMP.
- **ABACT (HQ/EV) (used in E&S tables only)** – antidegradation best available combination of technologies. For stormwater discharges in watersheds classified as High Quality (HQ) or Exceptional Value (EV) under Chapter 93, ABACT must be used if non-discharge alternatives are not available. The table identifies whether the listed alternative BMP qualifies as ABACT in HQ and EV watersheds ("Yes" or "No").
- **Function (used in PCSM table only)** – The function of the BMP in relation to stormwater: Water Quality (WQ), Rate Control (RC), Volume Control (VC), and/or Recharge.
- **DEP Review Date** – The date on which DEP finalized its review of the alternative BMP.
- **Example** – If applicable, DEP will list the name of a product or technology that illustrates an example of the listed alternative BMP and, if available, provide a link to the product or technology.

NOTE – The identification of an example product or technology is not an endorsement by DEP of the product or technology, and is provided solely to assist the reviewer in understanding the BMP reviewed by DEP.

Alternative E&S and PCSM BMPs
Revised, December 13, 2018

New Alternative BMP Proposals

To request that DEP's Bureau of Clean Water review a new alternative E&S or PCSM BMP, the applicant of a project seeking to use the alternative BMP or the manufacturer of the BMP must complete and submit the **Alternative BMP Submission Form** ([Word](#)) ([PDF](#)) to DEP. DEP will not review an alternative BMP without receipt of a complete Alternative BMP Submission Form and all applicable attachments as specified on the checklist to that form.

Completed forms should be sent via email to RA-EPALTERNATIVEBMP@pa.gov. DEP highly recommends that the alternative BMP review be completed prior to an applicant proposing the BMP in a permit application for a specific project. DEP attempts to complete all reviews of alternative BMPs within 90 days of receipt of a complete form and attachments.

Alternative E&S and PCSM BMPs
Revised, December 13, 2018

Approved Alternative E&S BMPs

Alternative E&S BMP	Description	ABACT - HQ	ABACT - EV	DEP Review Date	Example
Use of Wood Chips in Compost Socks	Tests show wood chips are as effective as compost for filtering sediment.	Yes	No	4/01/2012	Refer to Page 65 of the E&S Manual for compost sock installation.
Use of Switchgrass in Compost Socks	Tests show Switchgrass is as effective as compost for filtering sediment. This is a direct replacement for Compost sock and should follow the same standards.	Yes	Yes	3/01/2017	Big Switch Sock
Chinking sock or toe sock	A 4" filter sock, compost or switchgrass, that is used in place of the blown in material for sock placement. Cotton or other material listed on the fabric specifications for a sock (Table 4.1) may be used. Contact between the chinking sock the large sock and the ground should be managed by staking at a 10' max spacing using a 1"x1"X18" min stake. It is desirable to also pinch the chinking sock between the ground and the large sock (see example).			9/5/2018	BEG PBS Switch Chinking Sock Detail

Alternative E&S and PCSM BMPs
Revised, December 13, 2018

Alternative E&S BMP	Description	ABACT - HQ	ABACT - EV	DEP Review Date	Example
Belted Strand Retention Fabric Fence (in lieu of Standard Silt Fence)	In field use, it appears to be as effective as standard silt fence.	No	No	4/01/2012	Silt Saver BSRF
Stacking Compost Socks to equal larger diameter Compost Socks	Stacking of socks has already been approved when used in compost sock traps.	Yes	Yes	4/01/2012	Refer to Page 35 of the E&S Manual for proper stacking.
Foam Trench Breakers	This BMP has already been approved by FERC and was successfully demonstrated in a field test.	N/A	N/A	10/01/2011	Spray Foam Solutions
Public street sweeping with a vacuum sweeper and rolling of dirt and gravel roads at the end of each work day (or more frequently as needed); manual cleaning of tires prior to site egress.	Topography or the absence of electricity and water can make wash racks unfeasible in some locations. Vacuum sweepers can remove accumulated sediment from streets before it is washed into surface waters. Tires can be cleaned off manually with a broom prior to exiting. Rolling of dirt roads can stabilize areas affected by tracked mud. Requires continuous maintenance. This alternative BMP is a substitute for wash racks in special protection watersheds.	Yes	Yes	8/01/2012	
Use of Forebays and Turbidity Barriers (i.e., Silt Curtains) in lieu of Required Surface Area for Sediment Basins	Already approved for traps. Fulfills the purpose for increased surface area, making sediment basins more efficient and reducing thermal pollution. If Turbidity Barriers are used, they must conform to the specifications in DEP's E&S Manual.	Yes	Yes	8/01/2012	Refer to Page 177 of Chapter 6 of the PA Stormwater BMP Manual for forebay design recommendations
Sock Diversions	Approved conditional upon infill material being modified to reduce permeability and promote vegetative growth.	N/A	N/A	12/12/2012	Filtrexx Diamond Sock
HDPE Composite Mat for wetland crossings	Tests show product to be safe, non-toxic, and stable. Product is easily transported, stored, and installed, and it is reusable.	N/A	N/A	9/13/2013	Dura-Base® Mat

Alternative E&S and PCSM BMPs
Revised, December 13, 2018

Alternative E&S BMP	Description	ABACT – HQ	ABACT – EV	DEP Review Date	Example
Staked Compost Sock Ring surrounding pumped water filter bag	Compost sock ring will increase efficiency of sediment removal of the pumped water filter bag while providing additional water quality benefits.	Yes	Yes	10/10/2013	Example Diagram
Filter inserts for Cross Culverts	For use as a backup BMP in culverts or other pipes when used per manufacturer's recommendations. A recommended maximum tributary drainage area = 1 acre. Filter insert should be used in conjunction with other sediment control/removal BMPs, not as the sole BMP for a disturbed area. Filter inserts should only be used where sufficient area exists to allow for ponding of water above the pipe. Filter inserts alone are not ABACT, but can be used to raise another non-ABACT BMP (e.g., silt fence) to ABACT for HQ (but not EV).	No	No	11/12/2012	Sedjacket™
Curled Wood Sediment Logs	This BMP was already approved for use in other watersheds. The evidence supports their use as ABACT for HQ. Sediment removal potential is high compared to other similar BMPs. Since the water quality benefits derived from compost socks is not provided, ABACT designation is not extended to EV watersheds.	Yes	No	12/18/2012	Curlex® Sediment Log®
Inverted Discharge Rate Skimmer	For use as a dewatering skimmer in sediment basins and traps where peak flows must be delayed to avoid flooding downstream.	Yes	Yes	1/30/2013	Reverse Q Pond Outlet
Compost Sock Diversions in lieu of Waterbars on surface waterline ROWs for Oil & Gas drilling	Usually no earthmoving during installation of surface waterlines, so no material from which to construct waterbars. Clearing/grubbing in wooded areas means protective cover removed from soils, so BMP needed to direct runoff off ROW.	No	No	2/13/2013	Example Diagram

Alternative E&S and PCSM BMPs
Revised, December 13, 2018

Alternative E&S BMP	Description	ABACT - HQ	ABACT - EV	DEP Review Date	Example
Portable Sediment Tank w/Inclined planes for sediment removal	Tests have shown this BMP to be more effective than a sediment filter bag along with the capabilities to remove oils from the flow.	Yes	Yes	6/14/2014	Aqualete WTS2000
Sump & Compost Filter Sock at Waterbar Outlet on Utility Lines	Used to filter runoff from ROW before being discharged.	Yes	Yes	8/27/2014	Example Diagram
Float Skimmer Attached to Ridged Pipe	Information submitted shows device effectively regulated discharge from impoundments	Yes	Yes	9/02/2014	Marlee Float™ Skimmer
Inlet Filter Mat	Coir mat that is a replacement for an Inlet Filter Bag. Tests show that the mat meets removal efficiencies of Inlet filter bags.	Yes	No	4/18/2016	Diamond Sock Inlet Filter Mat
Prefabricated HDPE channels	Prefabricated HDPE channel sections will not erode and can be easily cleaned and maintained.	No	No	8/09/2016	SmartDitch
Alternative Rock Construction Entrance (has an additional 50' (non-special protection) or 100' (special protection) of rolled 2RC)	The rolled 2RC will provide a stable surface to turn into, helping to preventing tires from getting stuck while entering. Will also help to eliminate the AASHTO #1 from being drug onto the road.	Yes	Yes	12/01/2016	Example Diagram

Alternative E&S and PCSM BMPs
Revised, December 13, 2018

Alternative E&S BMP	Description	ABACT – HQ	ABACT – EV	DEP Review Date	Example
Soil Binders and Flocculants with Polyacrylamides	<p>The use of soil binders and flocculants containing polyacrylamides (PAMs) can be effective for stabilizing steep slopes and other disturbed areas when used properly and in accordance with manufacturer’s recommendations. Soil binders with PAMs can be used in conjunction with hydraulic blankets; however, the hydraulic blankets should have a minimum functional longevity of at least one year.</p> <p><u>The following uses do not require Bureau of Clean Water approval before use:</u> Any use of anionic PAMs where treated stormwater will flow into a sediment trap or basin.</p> <p><u>The following uses require Bureau of Clean Water approval before use:</u> Any use of anionic PAMs where treated stormwater will flow directly to surface waters or storm sewers without settlement in a sediment trap or basin, or application directly to sediment traps or basins.</p> <p><u>The following uses are prohibited:</u> The use of any flocculant or material containing cationic PAMs for stormwater treatment.</p> <p>NOTE – Upon cessation of earth disturbance activities the permittee is expected to properly dispose of all sediment or material containing PAMs collected in sediment trap(s) or basin(s).</p>	Yes	Yes	8/31/2018	Refer to Page 276 of the E&S Manual for additional guidance on the use and application of PAMs.

Alternative E&S and PCSM BMPs
Revised, December 13, 2018

Alternative E&S BMP	Description	ABACT - HQ	ABACT - EV	DEP Review Date	Example
Heavy-duty Woven Geotextile Sediment Fence	Testing provided shows that this sediment fence product results in water quality equivalent to silt fence. This sediment fence is 30-in. or 34-in. above the surface of the ground, with the sediment fence trenched 6-in. or 8-in., respectively, into the existing soil (similar to silt fence). The 30-in. sediment fence is supported by wooden stakes spaced every 8-ft., while the 34-in. sediment fence is supported by galvanized steel posts and wooden stakes alternating every 5-ft. The 30-in. sediment fence will use slope lengths equivalent to reinforced silt fence, and the 34-in. sediment fence will use slope lengths equivalent to super silt fence.	No	No	12/12/2018	ACF Environmental SMARTfence® 36 and SMARTfence® 42

Alternative E&S and PCSM BMPs
Revised, December 13, 2018

Disapproved Alternative E&S BMPs

Alternative E&S BMP	Description	ABACT – HQ	ABACT – EV	DEP Review Date	Example
Solid panels for use as sediment barrier/diversion	Not permeable enough to let runoff through in sufficient quantities to prevent overtopping, and not totally impermeable to prevent uncontrolled runoff.	N/A	N/A	10/01/2011	
Temporary Diversion Fence (used to channelize and convey runoff)	Temporary fabric is not durable enough and could get torn by debris being conveyed in the channel. Animals could easily compromise the fabric by forming holes in the material.	No	No	4/18/2016	

Alternative E&S and PCSM BMPs
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Approved Alternative PCSM BMPs

Alternative PCSM BMP	Description	Function	DEP Review Date	Example
Inlet Filter Bags with Metal Frames configured to fit the Inlet	Information provided showed such bags can remain functional during high runoff conditions conventional inlet filter bags.	WQ	02/13/2013	FlexStorm
Buoyant Flow Control Devices (BFDs)	Information submitted shows device effectively regulated discharge from impoundments. These devices should be used according to manufacturer's specifications.	RC	12/17/2014	Thirsty Duck Constant Q – Lane Enterprises
Flat Gravel Pad Detention	Use of subsurface rock to store stormwater under a Well Pad. <u>This is for rate control only.</u> Water quality is to be handled with a different BMP.	RC	03/07/2017	Flat Gravel Pad Details
Jellyfish Filter	Jellyfish Filter, manufactured by Contech Engineered Solutions, is a stormwater quality treatment technology featuring high flow pretreatment and membrane filtration. This product has been evaluated and determined to have the following pollutant removal efficiencies: 85% for TSS, 50% for TP, and 38% for TN. This device should be used according to manufacturer's specifications.	WQ	12/13/2018	Contech Engineered Solutions Jellyfish Filter

Alternative E&S and PCSM BMPs
 Revised, December 13, 2018

Alternative PCSM BMP	Description	Function	DEP Review Date	Example
Managed Release Concept (MRC)	<p>MRC provides for the controlled release of a portion of the stormwater captured by a BMP, preferably vegetated, at a rate similar to the lateral unsaturated flow to surface waters from undeveloped areas, which should not cause environmental degradation. A PA-licensed Professional Engineer must design any BMP that uses MRC. MRC may be used only under limited situations.</p> <p>Important links:</p> <ul style="list-style-type: none"> • MRC white paper with design standards • MRC BMP Design Summary sheet (Word) (PDF) (one sheet must be completed and submitted per proposed BMP using MRC) 	VR, WQ	12/13/2018	<p>MRC Video Presentation produced by Villanova University</p>

Version History

Date	Version	Revision Reason
12/13/2018	1.3	Added the following: <ul style="list-style-type: none"> • Alternative BMP Submission Form; • Managed Release Concept (approved alternative PCSM BMP); • Jellyfish Filter by Contech Engineered Solutions (approved alternative PCSM BMP); • Heavy-duty Woven Geotextile Sediment Fence (approved alternative E&S BMP); • 16-in. height for Multi-Layer Geotextile Filter Fence (approved alternative E&S BMP); • Chinking/toe sock (approved alternative E&S BMP)
08/31/2018	1.2	Addition of Constant Q float, Flat Gravel Pad details, and multi-layer geotextile filter fence. Revised description and example for Soil Binders with Polyacrylamides (previously called Soil binders with anionic polyacrylamides). Removed FocalPoint Biofiltration System and Inclined Plate Hydrodynamic Separator from the Approved Alternative PCSM BMP list because there is a lack of information concerning their effectiveness at removing TSS using EPA approved analytical methods for measuring TSS. These manufactured devices can still be used as a PCSM BMP for water quality, but only to the removal efficiencies identified the PA Stormwater BMP Manual.
03/29/2017	1.1	Added FocalPoint Biofiltration System as an approved alternative PCSM BMP.
03/21/2017	1.0	Original