

TPDES MSGP SWPPP FOR TEXAS AGGREGATE PROCESSING FACILITY

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PROJECT OVERVIEW

[Willis, Texas](#)

ESE supported a 2.78-acre aggregate processing and materials handling facility in Willis, Montgomery County, Texas. The facility manages outdoor sand and aggregate road base stockpiles, loading areas, haul routes, fuel storage, and equipment support activities. ESE was engaged to develop a site-specific Stormwater Pollution Prevention Plan under the TPDES Multi-Sector General Permit TXR050000 and support permit coverage for industrial stormwater discharges.

CHALLENGES

The facility is regulated under TCEQ's TPDES MSGP as Sector J, Mineral Mining and Processing, with SIC 1442 for construction sand and gravel. Key stormwater risks included exposed aggregate stockpiles, sediment tracking, dust suppression water, maintenance and refueling areas, fuel and oil storage, and potential runoff from adjacent aggregate operations. The site required defensible drainage mapping, outfall characterization, benchmark monitoring procedures, and routine inspection controls aligned with MSGP requirements.

ESE'S APPROACH

ESE completed a stormwater compliance evaluation, developed facility-specific drainage and receiving waters mapping, identified exposed materials and pollutant pathways, and established operational BMPs for aggregate handling activities. The SWPPP was structured to address TCEQ requirements for inspections, visual monitoring, benchmark sampling, numeric effluent limitations, spill response, training, and recordkeeping. ESE also supported NOI documentation and compliance procedures for ongoing implementation.

KEY ELEMENTS IMPLEMENTED

- Developed a TPDES MSGP SWPPP for Sector J aggregate operations
- Prepared drainage area mapping, outfall identification, and stormwater flow direction
- Documented exposed materials including sand, oils, grease, diesel, and DEF
- Established sediment, tracking, dust suppression, fueling, and spill response controls
- Created inspection, benchmark monitoring, visual monitoring, DMR, and rainfall log forms
- Defined annual training, recordkeeping, SWPPP revision, and spill reporting procedures

RESULTS

The facility obtained a structured stormwater compliance program aligned with TCEQ MSGP requirements. ESE's SWPPP clarified pollutant sources, control measures, inspection schedules, sampling procedures, and recordkeeping responsibilities. The program improved operational consistency for aggregate stockpile management, haul road tracking prevention, stormwater monitoring, and spill response readiness.

PROJECT IMPACT

The project provided a defensible compliance framework for an active Texas aggregate facility with exposed outdoor materials and operational stormwater risks. By integrating BMPs, mapping, monitoring, and training into a single implementation-ready SWPPP, the facility improved audit readiness and reduced the risk of unmanaged sediment, fuel, oil, and stormwater compliance issues.