

Year 2 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2019-June 30, 2020

*****Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form*****

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: VA Edith Nourse Rogers Memorial Hospital

EPA NPDES Permit Number: MAR042033

Primary MS4 Program Manager Contact Information

Name: Joseph Kitko

Title: GEMS Program Manager

Street Address Line 1: 200 Springs Rd

Street Address Line 2: N/A

City: Bedford

State: MA

Zip Code: 01730

Email: joseph.kitko@va.gov

Phone Number: (781) 687-2222

Stormwater Management Program (SWMP) Information

SWMP Location (web address): GEMS Office, Building 21, Room 100B.

Date SWMP was Last Updated: Jan 31, 2019

If the SWMP is not available on the web please provide the physical address:

The Edith Nourse Rogers Memorial Veterans Hospital (Bedford VAMC) is located at 200 Springs Road, Bedford, MA 01730

The Bedford VAMC SWMP is physically located on the facility campus in the GEMS Office of Bldg. 21 Room 100B.

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

- ☒ Bacteria/Pathogens
 ☐ Chloride
 ☐ Nitrogen
 ☐ Phosphorus
☐ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

- In State:**
☐ Assabet River Phosphorus
 ☐ Bacteria and Pathogen
 ☐ Cape Cod Nitrogen
☐ Charles River Watershed Phosphorus
 ☐ Lake and Pond Phosphorus
Out of State:
☐ Bacteria/Pathogens
 ☐ Metals
 ☐ Nitrogen
 ☐ Phosphorus

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 2 Requirements

- ☒ Completed Phase I of system mapping
☒ Developed a written catchment investigation procedure and added the procedure to the SWMP
☒ Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
☒ Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
☒ Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
☐ Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
☒ Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
 Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or
☐ operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

A consultant has been contracted to evaluate these requirements and to ensure fulfillment of these requirements will be met. The unchecked requirements will be incorporated into the SWMP during Permit Year 3.

Annual Requirements

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- ☒ Kept records relating to the permit available for 5 years and made available to the public
- ☒ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - ☐ This is not applicable because we do not have sanitary sewer
 - ☒ This is not applicable because we did not find any new SSOs
 - ☐ The updated SSO inventory is attached to the email submission
 - ☐ The updated SSO inventory can be found at the following website:

N/A

- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ Updated outfall and interconnection inventory and priority ranking as needed

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

N/A

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)Annual Requirements*Public Education and Outreach**

- ☐ Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☐ Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- ☐ Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Due to the impacts of COVID-19, our facility was unable to acquire and install pet stations throughout the campus with public messaging appropriate for the surrounding community residents who walk their pets

throughout the campus. The pet station units arrived on campus in August, 2020. We are working closely with our Landscaping team to have these installed throughout the campus by 15 Oct 2020 and to distribute the corresponding educational material at that time as well.

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

The Bedford VAMC does not own any septic systems.

Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

☐ Yes

☒ No

If yes, describe below, including any relevant impairments or TMDLs:

N/A

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

Number of educational messages completed **during this reporting period:**

*Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.*

BMP:Bedford VAMC Storm Water Awareness

Message Description and Distribution Method:

The Bedford VAMC Storm Water awareness message details what storm water is, how it can be polluted, and a brief description of the common storm water catchment basin stenciled public statement created each Spring around the campus. Distribution of the message is through dissemination from facility chiefs, managers, and supervisors to all their subordinate personnel by email.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The measurable goal for dissemination of the educational message is the number of personnel per Service Line who received the message.

Message Date(s):

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☐

Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period**:

The SWMP was again the topic during an internal GEMS Committee meeting of a diverse member group from multiple disciplines throughout the medical center.

Was this opportunity different than what was proposed in your NOI? Yes ☐ No ☒

Describe any other public involvement or participation opportunities conducted **during this reporting period:**

N/A

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

☐ This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period.***

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Below, check all that apply.

The following elements of the Phase I map have been completed:

- ☒ Outfalls and receiving waters
- ☒ Open channel conveyances
- ☒ Interconnections
- ☒ Municipally-owned stormwater treatment structures
- ☒ Waterbodies identified by name and indication of all use impairments
- ☒ Initial catchment delineations

Optional: Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

N/A

Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.

- ☒ The outfall screening data is attached to the email submission
- ☐ The outfall screening data can be found at the following website:

N/A

*Below, report on the number of outfalls/interconnections screened **during this reporting period.***

Number of outfalls screened:

16

Catchment Investigations

If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.

- ☒ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

N/A

*Below, report on the number of catchment investigations completed **during this reporting period.***

Number of catchment investigations completed this reporting period:

119

*Below, report on the percent of catchments investigated **to date.***

Percent of total catchments investigated:

100

Optional: Provide any additional information for clarity regarding the catchment investigations below:

All catch basins were cleaned during a repair project.

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- ☐ The illicit discharge removal report is attached to the email submission
- ☐ The illicit discharge removal report can be found at the following website:

N/A

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period.***

Number of illicit discharges identified:

0

Number of illicit discharges removed:

0

Estimated volume of sewage removed:

0

 gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018).***

Total number of illicit discharges identified: Total number of illicit discharges removed:

Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

N/A

Employee Training

Describe the frequency and type of employee training conducted **during the reporting period:**

New employees receive training every week during New Employee Orientation. Employees received general awareness training at the beginning of the summer. The new SWMP will be uploaded to the facility's website.

MCM4: Construction Site Stormwater Runoff Control

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period.***

Number of site plan reviews completed: Number of inspections completed: Number of enforcement actions taken:

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

A major water line replacement project is ongoing along with the catch basin repair project. Two minor infractions were noted and managed appropriately by the contractor. Both infractions were related to street sweeping, however, erosion control measures were operational and functioning efficiently.

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance or Regulatory Mechanism

Below, select the option that describes your ordinance or regulatory mechanism progress.

- ☒ Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- ☐ Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- ☐ Bylaw, ordinance, or regulations have not been updated or adopted

As-built Drawings

Describe the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

The VA has specifications in place that require the submittal of as-built plans within 1 year of the completion of the project. Long term O&M plan submittal is a contractually mandated requirement of contractors.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

The Bedford VAMC continues to review the requirements of the this assessment. The campus has changed parking patterns and designations to improve parking for patients.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

The Bedford VAMC is currently reviewing the requirements of this report and assessing all construction projects scheduled for design throughout this time period for compliance with these requirements. Although this requirement is not applicable to non-traditional MS4s, this facility continues to consider sustainable green infrastructures where applicable.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

The progress of this inventory is ongoing.

MCM6: Good Housekeeping

Catch Basin Cleaning

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period.***

Number of catch basins inspected: 119

Number of catch basins cleaned: 119

Total volume or mass of material removed from all catch basins: 42 pounds

Below, report on the total number of catch basins in the MS4 system.

Total number of catch basins: 119

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

No catch basin sumps were found to be more than 50% full during both the repair project and the catch basin investigation events.

Street Sweeping

*Report on street sweeping completed **during this reporting period** using one of the three metrics below.*

☒ Number of miles cleaned: 3

☐ Volume of material removed: [Select Units]

☐ Weight of material removed: [Select Units]

O&M Procedures and Inventory of Permittee-Owned Properties

Below, check all that apply.

The following permittee-owned properties have been inventoried:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☒ Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☒ Vehicles and equipment

Stormwater Pollution Prevention Plan (SWPPP)

*Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period**.*

Number of site inspections completed: 0

Describe any corrective actions taken at a facility with a SWPPP:

The Bedford VAMC has contracted with a consulting firm during the upcoming Permit Year 3 to determine the need for a SWPPP for this campus. If a SWPPP is required, it will be drafted and implemented as required.

Additional Information

Monitoring or Study Results

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- ☒ Not applicable
- ☐ The results from additional reports or studies are attached to the email submission
- ☐ The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

N/A

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

N/A

COVID-19 Impacts

Optional: If any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

N/A

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

Provide any additional details on activities planned for permit year 3 below:

The Bedford VAMC will continue ongoing progress on verifying and identifying the catch basins through metal alphanumeric ID stamping system of the catch basin grate covers and the storm water awareness stenciling projects.

Part V: Certification of Small MS4 Annual Report 2020

40 CFR 144.32(d) Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name:

Joseph Kitko

Title:

GEMS Program Manager

Signature:

Date:

09/23/20

*[Signatory may be a duly authorized
representative]*

Note: When prompted during signing, save the document under a new file name.

Annual Report Submission

Please submit the form electronically via email to both EPA and MassDEP by clicking on one of the links below or using the email addresses listed below. Please ensure that all required attachments are included in the email and not attached to this PDF.

EPA: stormwater.reports@epa.govMassDEP: laura.schifman@mass.gov

Paper Signature:

If you did not sign electronically above, you can print the signature page by clicking the button below.

[Print Signature Page](#)

Optional: If you did not sign electronically above, you may lock the form by clicking the "Lock Form" button below which will prompt you to save the locked version of the form. Save this locked version under a new file name.

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