

Year 4 Annual Report

Massachusetts Small MS4 General Permit

Reporting Period: July 1, 2021-June 30, 2022

****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, 2021 and June 30, 2022 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: Anthony Mango

Title: GEMS Program Manager

Street Address Line 1: 200 Springs Road

Street Address Line 2:

City: Bedford

State: MA

Zip Code: 01730

Email: Anthony.Mango@va.gov

Phone Number: (781) 687-4483

Stormwater Management Program (SWMP) Information

SWMP Location (web address): VHA Intranet - <https://dvagov.sharepoint.com/sites/VHABEDIntranet/programs/Pages/GEMS.aspx>

Date SWMP was Last Updated: 3/28/2022

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

200 Springs Road,

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 4 Requirements

- ☒ Developed a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:

- ☒ No updates were recommended
☐ Updates were recommended. The anticipated date or date of completion for updates is/was:

- ☒ Developed a report assessing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist, made it available as part of the SWMP, and:

- ☒ No updates were recommended
☐ Updates were recommended. The anticipated date or date of completion for updates is/was:

- ☒ Identified a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover

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

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:
- ☒ Updated system map due in year 2 as necessary
- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- ☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary
- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☒ Inspected all permittee owned treatment structures (excluding catch basins)

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:

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:

Bedford VAMC does not own/operate any septic systems - Note: Dog waste notices/education placed at dedicated, fenced, centrally located dog walking area.

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

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:

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:[Message name here]

Message Description and Distribution Method:

Live Training demonstration provided biweekly

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Provide all new employees, education staff with an understanding of our stormwater program, and the controls in place to protect the environment. Educate staff on their responsibilities under the program, and how they can become involved further. The focus of the responsibilities portion is educating staff on - 1. How stormwater can become polluted 2. How to report suspected pollutants.

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:

NA

[Add an Educational Message](#)

MCM2: Public Participation

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

Annual environmental training provided to all staff instructs participants on how their voice can be heard, and provides contact information for the VHA GEMS committee.

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:**

Leadership of each pertinent service line within our facility is involved in the Green Environmental Management Systems committee, as part of this we review all environmental policies including the SWMP, and allow for representatives to provide feedback to our plan, which is incorporated in discussions with the 3rd party who generates updated programs on our behalf.

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

Optional: Provide additional status information regarding your map:

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. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- ☒ No outfalls were inspected
- ☐ The outfall screening data is attached to the email submission
- ☐ The outfall screening data can be found at the following website:

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

Number of outfalls screened:

*Below, report on the percent of outfalls/interconnections screened **to date**.*

Percent of outfalls screened:

Optional: Provide additional information regarding your outfall/interconnection screening:

The Bedford VAMC is currently in contract negotiations to implement a comprehensive catch basin cleaning program, in cooperation with the town of Bedford Department of Public Works.

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.

- ☐ No catchment investigations were conducted
- ☒ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following website:

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

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.

- ☒ No illicit discharges were found
- ☐ The illicit discharge removal report is attached to the email submission
- ☐ The illicit discharge removal report can be found at the following website:

*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:

Number of illicit discharges removed:

Estimated volume of sewage removed: 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: 0

Total number of illicit discharges removed: 0

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

Employee Training

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

Employee training is provided in several formats.

1. Annual environmental awareness training is provided to all staff via a talent management system.
2. Live training on Spill control is provided annually to Grounds, Boiler plant operators, engineering emergency responders, and the GEMS office.
3. IDDE training is provided to construction engineers, Grounds, and GEMS office employees annually.
4. The GEMS office technician is engaged in advanced environmental training courses to improve our program holistically.
5. Network wide training is provided by VISN leadership to environmental staff.

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: 3

Number of inspections completed: 104

Number of enforcement actions taken: 2

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

Enforcement actions included

1. Direction to contractor to secure and cover unguarded construction dumpster, left uncovered prior to a rain storm. (NOTE: dumpster was covered prior to rainstorm.)
2. Unguarded catch basin located at steam line repair site, corrected by GEMS office, engineer trained appropriately to prevent repetition.

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

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3): 12/17/2021

As-built Drawings

Below, report on the number of as-built drawings received during this reporting period.

Number of as-built drawings received: 1

Optional: Enter any additional information relevant to the submission of as-built drawings:

The VA has specifications in place that require contractors to submit as built plans within 1 year of project completion.

Retrofit Properties Inventory

Below, list the permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (at least 5):

NOTE: The Bedford VA is contained to one property, below is a list of departments/programs which have written BMPs currently being implemented. All are located, or otherwise impact 200 Springs Road, Bedford Ma. 01730.

1. Winter Road Maintenance program (campus wide)
2. Grounds department Street sweeping program (campus wide)
3. Engineering Operations an Maintenance inspection Program SOP. (campus wide)
4. Engineering Projects section Inspection and Maintenance SOP. (Construction site specific)
5. Catch Basin Inspection and Cleaning SOP. (Campus wide)

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: 0

Total volume or mass of material removed from all catch basins: 60 pounds

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

Total number of catch basins:

If applicable:

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

Street Sweeping

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

☒ Number of miles cleaned:

☐ Volume of material removed:

☐ Weight of material removed:

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:

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

Salt shed was noted to have damage resulting in dry salt spilling outside of the enclosure. The Salt was promptly removed, and the shed sufficiently repaired.

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:

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:

COVID-19 Impacts

Optional: If any of the above year 4 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:

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 5 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

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 curbed streets at least annually
 - Continue investigations of catchments associated with Problem Outfalls
 - Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
 - 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
 - Review O&M programs for all permittee owned facilities; update if necessary
 - Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
 - Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
 - Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
 - Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
 - Inspect all permittee owned treatment structures (excluding catch basins)
 - Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 5 below:

Part V: Certification of Small MS4 Annual Report 2021

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:

Anthony Mango

Title:

GEMS Program Manager

Signature:

Date:

[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: Stormwater.DEP@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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