



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street, Boston, MA 02108-4619

DEVAL L. PATRICK
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APR 30 2009

Glenda Velez
US Environmental Protection Agency - CIP
One Congress Street-Suite 1100
Boston, MA 02114-2023

Fred Civian
Massachusetts Department of Environmental Protection
One Winter Street - 5th Floor
Boston, MA 02108

April 30, 2009

RE: Small MS4 Permit, Year 6 Submission for
Massachusetts Hospital School (MAR42004), and
Tewksbury Hospital (MAR42005)

Dear Ms. Herrick and Mr. Civian:

Attached are copies of our annual report for the fifth year under the above-referenced
NOI submissions. If you have any questions about this submittal, please contact Ruth Alfasso at
(617) 624-5757.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip J. McCauley".

Philip J. McCauley, Director
Bureau For Public Health Facilities
Department of Public Health

cc. Suzanne K. Condon, Associate Commissioner, Bureau of Environmental Health
Ruth Alfasso, Environmental Compliance Officer, Bureau of Environmental Health

Municipality/Organization: Massachusetts Hospital School

EPA NPDES Permit Number: MAR42004

MADEP Transmittal Number: W-035181

**Annual Report Number
& Reporting Period:** No. 6: March 08-March 09

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Phil McCauley

Title: Director, Bureau For Public Health
Facilities, Massachusetts Department of Public
Health

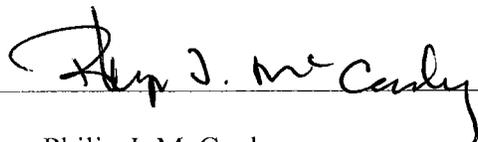
Telephone #: (617) 624-5245

Email: Philip.McCauley@massmail.state.ma.us

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, 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.

Signature: _____



Printed Name: Philip J. McCauley

Title: Director, Bureau For Public Health Facilities

Date: April 27, 2009

Part II. Self-Assessment

The facility of Massachusetts Hospital School has completed the required self assessment and has determined compliance with all permit conditions. Please note that this is a State-owned and operated campus facility and not a municipal facility.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B1-2	Identify all groups with facilities on campus to target info.	Facilities Management and Human Resources	List of groups with contact info	This list was compiled in permit year 1 and continues to be updated yearly. (Item B2-1 is related and is no longer listed separately)	This list will be updated on a yearly basis to reflect changes.
B2-1	Compile list of existing activities on campus with potential stormwater impact	Facilities Management and Human Resources	List of activities with organization and contacts (this item and B1-2 are related)	This list was compiled in permit year 1 and continues to be updated yearly.	This list will also be updated yearly.
B1-1	Brochure development and distribution	Facilities Management and Human Resources	Brochure completed and published, number and availability	A few hundred brochures have been produced. Brochures are continually available to anyone entering the campus at the administrative building.	Brochures are printed up and distributed and will remain available
B1-3	Integrate good housekeeping into orientation and yearly training	Facilities Management and Human Resources	A training program with recordkeeping on individuals trained in their HR files	A video presentation is available for training by facility staff. Regular orientation and refresher training commenced during permit year 3.	Good housekeeping training will continue.
B1-4	Develop curriculum for school on stormwater	Human Resources	A curriculum unit for some classes in the school	It is uncertain whether this curriculum can be put in place. However, discussions have taken places with facility staff and human resources.	Additions to curriculum have not been possible at this time due to Dept. of Education requirements.
Revised	This item may not be possible. It has been postponed to permit year 6.				
B1-5	Guest speaker on stormwater and other environmental issues	Facilities Management and Compliance Officer	One presentation with handouts and/or posters. May be done in coordination with other DPH facilities	This item has continued to be postponed due to budget constraints	This activity is now planned for later in 2009.
Revised	This item has been postponed				

1a. Additions
(none)

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B2-4	Coordinate with town of Canton	Compliance Officer and Facilities Management	Meetings with town of Canton	The town of Canton is not currently interested in working with the facility on stormwater issues.	DPH Compliance officer will continue to keep in touch with Canton
Revised					
B2-3	Stormwater stencil day	Facilities Management and Compliance Officer	Storm drains located in parking lots or roads to be stenciled	This item has been delayed due to continued construction at the facility and a lack of funds and staff time. It is now scheduled to be performed in summer of 2009.	Drain stenciling, including a unique number for each drain, will be performed in 2009 if time and money availability permit.
Revised	<i>This item has been postponed</i>				
B2-2	Publicize existing environmental/watershed groups	Human Resources and Compliance Officer	Information on local watershed groups are to be made available to staff and visitors to the facility.	Work on publicizing the Neponset River Watershed association has begun. Information on this organization and related activities will be posted in an area visible to staff, patients and visitors to the facility.	Updated materials will be made available at least yearly.
Revised					

2a. Additions

(none)

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B3-1 Revised	Compile maps and other info of existing stormwater system	Facilities Management	Maps in large format and standard handout size	A base map is available now, and used by facility staff. Additional information is added as it becomes available. GPS mapping has been postponed pending funding availability.	The use of GPS equipment to map storm drains and other features is planned for summer of 2008.
B3-3 Revised	Survey of campus buildings for illegal connections	Facilities management	All buildings checked using dye, smoke or other method	The locations of potential interconnections have been determined. The facility is working on obtaining funds to perform smoke or dye testing. This may be available through a Division of Capital Asset Management (DCAM) program for facility repairs currently in use. Although this activity was planned to be conducted earlier, the funding is not yet available.	Smoke and/or dye testing will be conducted when funding for this activity becomes available.
B3-2 Revised	Develop written SOP for handling illicit connections	Facilities management and human resources	One or more written SOPs. This will serve the purpose that a bylaw would for a town.	Illicit connections are not allowed during any construction activities. A written statement of this has been added to the facility maintenance handbook.	No additional activities are planned on this item.
B3-4 Revised	Repair of any illicit connections discovered (if any are found)	Facilities Management	Full sanitary/storm sewer separation	This item started in spring of 2005 with areas suspected to have connections between the storm sewer system and other piping. If additional locations are identified during the activities listed in B3-3, they will be repaired as soon as feasible.	This work will continue until the entire storm sewer system has been surveyed and any needed repairs will be made as needed on an ongoing basis.
B3-5 Revised					

3a. Additions (none)

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B4-1	Work with DCAM to review and develop contract language to address stormwater issues	Compliance Officer	Review and revision to existing SOPS and new contract language as needed to ensure stormwater procedures are followed during construction	Any large project requiring stormwater controls at Mass Hospital School are typically carried out under DCAM project management. Coordination with DCAM has occurred this permit year during construction of a horse arena building to ensure that stormwater concerns were addressed.	Coordination with DCAM will continue throughout all permit years.
Revised					
B4-2	Develop/implement training for employees who oversee construction activities	Human Resources and Facilities Management	Training program specific to construction/landscaping related employees on site with documentation in HR files.	A video presentation is available for training by facility staff. (See also B1-3)	Regular orientation and refresher training will continue.
Revised					

4a. Additions

B4-4	Green landscaping project	Compliance officer and facilities management	Goal will be small greenspace area collecting some stormwater from the new lot	The green-landscape project was designed and installed this permit year.	follow-up evaluation will be conducted each growing season.
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5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B5-1	Codify maintenance of storm drains and other control measures	Compliance Officer and Facilities Management	Written SOPS or use of CAMIS to direct frequency of these maintenance measures	Information has been put into the DCAM CAMIS system (a preventative maintenance database) to direct facilities staff when to perform maintenance; the system is also used to log completion.	This system will be used until further notice.
Revised					
Revised					

5a. Additions
(none)

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B6-5 Revised	Storm drain cleaning	Facilities management	Cleaning on a regular schedule	This has commenced, is being performed by the facility's waste contractor, and will be tracked using the CAMIS system (See BMP 5-1)	This activity will continue as scheduled, indefinitely.
Revised					
Revised					
Revised					

6a. Additions

(none)

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

Not Applicable for Mass Hospital School

Part IV. Summary of Information Collected and Analyzed

Massachusetts Hospital School does not have water quality data and does not intend to collect any under this permit

Part V. Program Outputs & Accomplishments (OPTIONAL)

Since MHS is not a municipality, many of these criteria do not apply. Relevant information on these outputs is contained in the tables above.

Municipality/Organization: Tewksbury Hospital

EPA NPDES Permit Number: MAR42005

MADEP Transmittal Number: W-035389

**Annual Report Number
& Reporting Period:** No. 5: March 08- March 09

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Phil McCauley

Title: Director, Bureau For Public Health
Facilities, Massachusetts Department of Public
Health

Telephone #: (617) 624-5245

Email: Philip.McCauley@massmail.state.ma.us

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, 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.

Signature:



Part II. Self-Assessment

The facility of Tewksbury Hospital has completed the required self assessment and has determined that it is in compliance with all permit conditions. Please note that this is a State-owned and operated campus facility and not a

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B 1-2 Revised	Identify all groups using facility for targeting info and notices	Facilities management and human resources	List of groups with contact information	This list was completed in 2004 and will be revised on a yearly basis. Copies of the list are kept on site. The contact information has been used to distribute information on the Tewksbury Hospital Stormwater program and other environmental items.	This list will be updated yearly and will be used as needed.
B 1-3 Revised	Integrate education and good housekeeping into orientation and yearly training	Facilities management and human resources	All new staff to get stormwater materials with required training; records to be kept with other training record in personnel file	Initial training of all maintenance and groundskeeping staff has been conducted using a video presentation and handouts. Records with the name and date of training for these staff are being kept in the facilities management office and by the compliance officer.	Springtime “refreshers” will be conducted each year and records kept to record attendees.
B 1-1 Revised	Brochure development and distribution	Facilities management and Human Resources	An educational brochure designed and distributed to staff and visiting groups.	Tewksbury Hospital has used a brochure developed by EPA and the Weather Channel to distribute to staff and others at the hospital, including the various programs described in B1-2 above. The brochures contain contact information to enable people to contact the facilities department as well as access the EPA website on stormwater.	These brochures will be made available to staff, patients and visitors at the hospital

1a. Additions
(none)

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 5 (Reliance on partners indicated, if any)	Future Activities
B2-1 Revised	Compile list of existing related activities on campus each year	Facilities management and human resources	List of activities with organization name and contact	Tewksbury Hospital is undergoing some significant reorganization, and the completion of this list was delayed until permit year 2. (See also BMP B1-2 as these items are related). This list was completed in summer of 2004	This list will be updated in January of each year afterward.
B 2-4 Revised	Coordinate with town of Tewksbury	Compliance Officer and Facilities Management	Telephone meetings between Compliance Officer and Engineering Staff at the Town office.	Tewksbury has allowed us to read their stormwater management plan. They have no current need for face-to-face coordination with Tewksbury Hospital. As Tewksbury Hospital is a small portion of the town's land and much of the hospital's land is open space, they may not feel we have a significant enough impact to make coordination necessary.	DPH will continue to approach the town regarding stormwater issues.
B2-3 Revised	Catch basin map publication	Facilities Department	Distribute map showing location of drainage and catch basins.	A map of the catch basins has been developed and is available for facility staff. Locations of all storm drains have been marked using GPS systems.	A more detailed and user-friendly map will be completed when staff time and facility money permit.
B2-2 Revised	Publicize existing watershed groups	Facilities department and compliance officer	Information on the local watershed groups will be made available in locations around campus for staff and visitors	Information on the Shawsheen River Watershed Association is posted in the main hospital building. This organization has a website to which interested parties are directed.	Additional information will be solicited from the SRWA as needed.

2a. Additions

As a part of B2-3 above, GPS equipment was used to map the locations of storm drains, outfalls and other areas of interest and incorporated in a computerized storm sewer system map. This information will be used in the future when needed.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6	Future Activities
B3-1 Revised	Compile maps and other info on existing stormwater system	Facilities Management	Maps in both large format and standard handout size	(Reliance on partners indicated, if any) A map of the catch basins has been developed and is available for facility staff (this is the same BMP as B2-3 above)	See above under B2-3.
B3-2 Revised	Develop written SOP and work practices for stormwater management	Facilities management and Human Resources	One or more written SOPs	This SOP was completed and made a part of the facility management handbook at the facility. The policy includes information for groundskeeping, facility maintenance and vehicle maintenance staff. It includes information on recordkeeping and when an individual stormwater permit for construction may be needed.	This SOP is a part of the facility's operating procedures and will be used from now on. The policy will only be rewritten if needed based on changes in facility operations.
B 3-3 Revised	Survey of campus buildings for illegal connections	Facilities management	All buildings surveyed	Locations where there are potential interconnections have been identified. TH is working on finding a funding source to investigate these locations in detail and make any repairs needed.	This item is ongoing when money is available.

3a. Additions

(none)

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B4-1	Work with DCAM to develop contract language for new construction	Compliance Officer	Review and revision to existing SOPS and new contract language as needed to ensure stormwater procedures are followed during construction	Any large projects requiring stormwater controls at Tewksbury Hospital are typically carried out under DCAM project management. Compliance officer has reviewed current DCAM standards and has requested information on ongoing changes from DCAM.	Coordination with DCAM will continue throughout all permit years. This will also include potential work associated with hazardous waste site cleanup activities at the facility.
Revised					
B4-2	Develop/implement training for employees who oversee construction	Human Resources and facilities management	Portion of training program for relevant staff.	General training of facility management employees, including those who oversee construction, on stormwater principles. A list of trained employees is kept in the facility director's office. (see also B1-3 as these are the same group of employees)	Springtime "refreshers" will be conducted each year and records kept to record attendees. Stormwater issues will be a part of any kickoff meetings for relevant construction projects.
Revised					
Revised					
Revised					

4a. Additions

(none)

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B5-1	Codify maintenance of storm drains	Compliance Officer and Facilities management	Written SOPs or other methods (such as automated maintenance system use)	Storm drains are a part of the regular facility maintenance procedures.	The facility waste disposal contract and includes regular storm drain cleaning and maintenance in the scope of the contract.
Revised					
Revised					

5a. Additions

(none)

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 6 (Reliance on partners indicated, if any)	Future Activities
B6-3 Revised	Discussion with town of Tewksbury on potential to adopt some town BMPs	Compliance officer	Meetings and review of documents	See information on town coordination in BMP 2-4 above.	See information on town coordination in BMP 2-4 above.
B6-2 Revised	Review all relevant statewide and facility contracts for appropriate stormwater-related language	Facilities management and compliance officer	All contracts, etc., will be reviewed with changes made as applicable	This information has been incorporated into relevant contracts with programs.	This BMP will have ongoing maintenance of contracts new and existing.
B6-5 Revised	Work with on-site farmers on good practices related to stormwater	Facilities management	New work procedures as needed to control impacts New binding contracts directly between the farmers and the facility specifying practices to be followed to prevent stormwater contamination	All new contracts have been negotiated with the agricultural users of the facility. These contracts include information and requirements consistent with good stormwater practices and reporting of activities including those pertinent to good land stewardship. Any breach of these terms can be cause for termination of the contract.	Contract renewals occur every year for this land use and the farmers will be kept to the terms of the agreements.
B6-4 Revised	Refine procedures to dispose of animal and horse waste from site	Facilities management	New work procedures to target these materials and prevent stormwater contamination Binding contracts between the facility and the operator specifying practices to be followed to prevent stormwater contamination	All new contracts have been negotiated with the operators of the horse operations on the site and signed. These contracts include information and requirements consistent with good stormwater practices and reporting of activities including those pertinent to good land stewardship. Any breach of these terms can be cause for termination of the contract.	Regular monitoring of the terms of the contract is ongoing during the year.

B6-1	Review relevant facility SOPs	Facilities management	All facility work practices will be reviewed and changes	This item has commenced. The facility management department has a handbook of SOPs which is being reviewed for relevance to stormwater activities. The new SOP developed for item B3-2 has been added to this book as well.	This BMP will be subject to ongoing monitoring.
Revised					

6a. Additions

B6-5: The facility has revised its practices for movement of snow removed from roads and parking lots. The facility staff and Compliance Officer located areas on the property where excess snow can be placed to melt when snowfall totals are high. This area is be outside of the watershed protection boundary and located away from stormdrains, surface water and wetlands to prevent the runoff of any contamination present in the snow. These locations are made a part of the facility operating practices when necessary during a heavy snowfall. The effectiveness of the new snow storage locations is reviewed after each season.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)
TMDL issues exist for the Shawsheen River. Specific BMPs above which will have the most potential benefit on the river are B1-1, B1-2, B1-5, B2-4 and all BMPs under section 3 "illicit discharge detection and elimination". "Good Housekeeping" items B6-4 and B6-5 may also reduce pathogen loads to the waterways which connect to the Shawsheen.

**7a. Additions
(none)**

7b. WLA Assessment
None performed by Tewksbury Hospital; this is not anticipated to be part of our strategy.

Part IV. Summary of Information Collected and Analyzed

Tewksbury Hospital does not have water quality data and does not intend to collect any under this permit

Part V. Program Outputs & Accomplishments (OPTIONAL)

Since Tewksbury Hospital is not a municipality, many of these criteria do not apply. Relevant information on these outputs is contained in the tables above.