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Annual Report Number Year 7
& Reporting Period: April 1, 2009 – March 31, 2010

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2010)

Part I. General Information

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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: Roger Johnson

Title: Director

Date: 4/13/10

Part II. Self-Assessment

In March 2005, the Veterans Administration (VA) issued a directive which requires the Veterans Health Administration (VHA) and other VA Administrations and Staff Offices develop environmental policy and appropriate guidance for the development and implementation of Environmental Management Systems.

Subsequently the VHA implemented the Green Environmental Management System (GEMS) program, which provides a systematic framework for VA medical centers to manage their environmental "footprint," (i.e., the environmental impact associated with the operation of facilities and delivery of services). When implemented as part of the overall management system of a VA medical center, GEMS provide a set of processes and practices that enables a VA medical center to:

- (1) Identify and address the impacts that the VA medical center's work has on the environment;
- (2) Evaluate how environmental programs are managed;
- (3) Ensure compliance with applicable environmental requirements;
- (4) Determine opportunities for further and continual improvement;
- (5) Manage environmental responsibilities in a proactive manner and pay greater attention to environmental regulatory responsibilities;
- (6) Integrate its environmental program with organizational structure, responsibilities, facility planning activities, work practices and processes, organizational goals, operations, and resource allocation;
- (7) Prevent pollution and conserve resources;
- (8) Enhance its image with regulators, patients, the public, and stakeholder groups.

The systematic approach of GEMS allows VA medical centers to better focus on implementation and integration of environmental management programs and take a more inclusive and proactive view of environmental protection. The Northampton VA medical center (VAMC) has implemented a GEMS program under the direction of its GEMS Coordinator. During the first term of the MS4 permit (consisting of Years 1 thru 5) focus of the VAMC SWMP was evaluation of the implementation and effectiveness of Best Management Practices (BMPs) as described in the VAMC Storm Water Management Plan to help ensure implementation of the VAMC SWMP by end of Permit Year 5. This Annual Report summarizes on-going progress in continual improvement for the monitoring and measuring of goals and BMPs in the VAMC SWMP during Permit Year 7.

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 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities
1.3.1	Public Education Materials	GEMS Coordinator	Develop a stormwater section for the Patient Handbook. <i>Communicate stormwater awareness to VAMC employees through electronic publications on the intranet webpage and the VISTA email system. Communicate stormwater awareness to patients, visitors, and on-site contractors through hard copy publications distributed at the Infomatix Expo and in the Bear Mountain Newsletter.</i>	Continued to communicate stormwater awareness to various stakeholders (employees, patients, visitors, contractors, etc.). Infomatix Expo scheduled to occur in the fall of 2009 was cancelled on account of the H1N1 Pandemic Influenza event. Anticipate Infomatix Expo to be held during the fall of 2010. Because of the outbreak of H1N1 pandemic influenza required extensive support from Safety department personnel revised stormwater brochure was not fully realized.	Continue with periodic updates to the community through both electronic and hard copy media. Continue with distribution of stormwater brochure to employees, patients and visitors during the 2010 Infomatix Expo. Stormwater brochure to on-site contractors to be revised and distributed to all contractors through the Medical Center's Contracting Department.
1.3.2	Training Programs	GEMS Coordinator	Stormwater awareness topics have been incorporated into annual Oil SPCC training for VAMC employees.	Presentation of comprehensive stormwater training that includes assessment of BMPs and lessons learned was effective in raising awareness in regards to preventing and eliminating illicit discharges.	Continue with annual presentation of comprehensive SWMP training incorporating BMPs and lessons learned.

Revised			Present comprehensive stormwater training in addition to incorporation of stormwater awareness topics in other environmental program trainings.		
1.3.3	Storm Drain Identification Program	GEMS Coordinator	Identify and mark all stormwater catch basins in the VAMC MS4.	On-going seasonal snow-plowing activities continue to be a concern for a small percentage of damaged/missing Drains to River medallions.	Continue with on-going inspection and replacement of damaged or missing medallions (as needed).
Revised					
Revised					
Revised					
Revised					

1a. Additions

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2.3.1	Annual "Clean the Stream" Program	Not Assigned	Volunteers help clean and maintain the stormwater collection system.	N/A - VAMC anticipated recruiting volunteers to help the VAMC to "Clean the Stream" on an annual basis. This would be an annual one day event to raise awareness by coordinating volunteers to walk the facility outfalls and ponds to remove debris, and raise awareness about the impact of facility operations on the surrounding environment. Volunteer turnout for the event during Permit Year 1 was very poor and due to ongoing maintenance and upkeep by the Grounds Department, there was very little debris to remove. Evaluation of this BMP in Permit Year 2 determined that it offers minimal benefit to the overall implementation and it has been discontinued	No activities planned as BMP discontinued after Permit Year 2.
Revised	<i>This BMP was discontinued.</i>	N/A	N/A		
2.3.2	Partner/Support the City of Northampton	GEMS Coordinator	Establish and maintain communication with the City of Northampton Stormwater Program Coordinator.	During Permit Year 6 VAMC continued to maintain regular communication with Mr. Douglas McDonald, Stormwater Coordinator with the city of Northampton.	Continue to maintain and broaden the inter-municipal relationship between the VAMC and the City of Northampton.
Revised					
2.3.3	Call Center/Suggestion Box	GEMS Coordinator	Set up a designated telephone extension with a voice mailbox.	During Report Year 6 VAMC Stormwater brochure developed for the 2007 Informatics Expo contained Stormwater contact information. Stormwater contact info also communicated to employees on VAMC intranet and in emails to all employees.	Continue to inform employees and the public about VAMC designated telephone extension with voice mailbox for receiving stormwater related concerns or questions.
Revised					

Revised							
Revised							
Revised							

2a. Additions

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3.4.1	Storm Drain Map	Facilities Management Program	Comprehensive AutoCAD map of the drainage system identifying all drainage structures, connections, and outfalls	The map of the facility's stormwater drainage system developed during Permit Year 1 showed no changes to the drainage structures, connections and outfalls during Permit Year 6.	Continue with annual review of storm drain map of drainage system, and revise as necessary.
Revised					
3.4.2	Stormwater Policy	GEMS Coordinator	Implement a VAMC policy that describes potential non-stormwater discharges and prohibitions.	During Report Year 6 VAMC reviewed its published stormwater policy that was issued during Permit Year 2. Because of anticipated new 5 year permit to be forth coming from EPA, no changes were made to the facility's Stormwater Management Policy..	Awaiting new five (5) year permit requirements from EPA for MS4s. If received during year 2010, the facility will revise its Stormwater Management policy to include new EPA stormwater requirements.
Revised					
3.4.3	Illicit Discharge Detection Program	GEMS Coordinator / Facilities Management Program	Conduct quarterly compliance inspections of the system outfalls to identify possible cross connections through dry weather flow.	During Permit Year 6 documentation of catch basin and outfall inspections showed no illicit discharges. All catch basin were inspected as required and documented. Inspections include "dry" weather and "wet" weather inspections.	Revise catch basin and outfall inspection forms to reflect quarterly compliance inspections. Continue with annual training for personnel performing illicit discharge inspections during dry and wet weather conditions, and document the training.
Revised					
3.4.4	Illicit Discharge Elimination Program	GEMS Coordinator / Facilities Management Program	When illicit discharges are detected the VAMC will work to quickly correct the problem.	No illicit discharges were detected during Permit Year 6.	Continue to monitor for illicit discharges with timely address of identified discharges.
Revised					

3.4.5	Education Program	GEMS Coordinator	Educate VAMC employees, patients, visitors, and on-site contractors about preventing and eliminating illicit discharges.	During Permit Year 6, GEMS Coordinator presented comprehensive stormwater management training to all Facilities Management employees at the VAMC. Training included information about illicit discharges.	Continue to present comprehensive SWMP training incorporating the revised BMPs and lessons learned to employees who work at or near catch basins and outfalls.
Revised					
Revised					

3a. Additions

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities
4.2.1	Regulatory Controls	Facilities Management Program	Erosion and sediment control specifications.	Erosion and sedimentation control techniques are now being incorporated into all construction projects occurring at the Medical Center.	Continue with inclusion of sedimentation control techniques in construction, demolition and renovation projects, regardless of total land disturbance.
Revised					
4.2.2	Review and Site Inspection Procedures	GEMS Coordinator	Periodic inspections of erosion and sediment control structures during construction projects.	While informal inspections for construction site(s) occurred during Year 5, review of this BMP showed improvements needed particularly in the area of formal documentation of site inspections.	VAMC Stormwater policy to be reviewed and revised as necessary to require documentation of site inspections for erosion and sediment runoff from construction activities.
Revised					
4.2.3	Enforcement Procedures	GEMS Coordinator / Facilities Management Program	Contractor accountability and immediate correction of inadequate erosion and sediment control structures	During 2009 continued with Enforcement of contract specifications through Facilities Management Program Director and the VAMC Contracting Officer.	Continued enforcement.
Revised					
4.2.4	Procedures for Handling Public Comment	GEMS Coordinator / Facilities Management Program	Set up a designated telephone extension with a voice mailbox.	The GEMS Coordinator is the designated individual responsible for implementation of the SWMP. As indicated on the intranet webpage, interested parties may communicate their suggestions, ideas, or observations directly to the GEMS Coordinator.	Continue with publishing of information informing employees, visitors and other stakeholders of facility stormwater contact person and how to report stormwater related questions and concerns to the VAMC.
Revised					
Revised					
Revised					

4a. Additions

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 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities
5.3.1	Structural Stormwater Controls	GEMS Coordinator / Facilities Management Program	Identify structural controls in design documents and contract specifications	During Permit Years 1 thru 6 VAMC has not conducted any construction projects disturbing land greater than one acre and post structural stormwater controls have not been necessary.	Continue to evaluate all proposed construction projects for potential implementation of structural controls in design documents and contract specifications.
Revised					
5.3.2	Stormwater Policy	GEMS Coordinator	Stormwater policy should focus on preserving surface water quality.	Medical Center's Stormwater policy continues to support preservation of surface water quality.	Continue with annual review of VAMC Stormwater policy with the goal of publishing new SWMP should new permit requirements be required for the 2 nd 5 year permit period.
Revised					
5.3.3	Planning Strategies	GEMS Coordinator / Facilities Management Program	Develop planning strategies that focus on avoiding sensitive areas for development.	During Permit Years 1 thru 6 VAMC has not conducted any construction projects disturbing land greater than one acre and post structural stormwater controls have not been necessary.	Continue with evaluation of proposed construction projects for potential impact to sensitive areas of the facility.
Revised					
Revised					
Revised					
Revised					

5a. Additions

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 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.3.1	Employee Training Program	GEMS Coordinator	Stormwater awareness topics have been incorporated into a comprehensive Stormwater Management Training for those employees who work at or near stormwater catch basins and outfalls.	Presentation of stormwater training in conjunction with required annual spill prevention and safety training has been very effective in raising awareness about illicit discharges. During Permit Year 6 Safety Manager gave training on comprehensive stormwater that included review and assessment of all BMPs.	Continue with presentation of comprehensive SWMP training incorporating assessment of BMPs and lessons learned.
Revised					
6.3.2	Waste Oil Recycling	Grounds Department	Provide designated collection areas for proper management and disposal of waste oil and used cooking oil generated at VAMC.	Waste oil and used cooking oil that is generated throughout the VAMC is collected, managed, and recycled. Waste oil that is not recycled is stored, managed, and disposed of as hazardous waste. Medical Center is still prohibiting contractors from shipping waste oil off-site. All waste oil generated by contractors via construction work is collected, managed, and disposed of as MA hazardous waste. All waste oil generated by contractors is shipped off-site via hazardous waste manifests.	Continue to maintain program and monitor program to ensure oil does not enter stormwater catch basins. Continue to ensure all waste oil generated by contractors via construction projects is collected, stored, and disposed of as MA hazardous waste using a hazardous waste manifest.
Revised					
6.3.3	Catch Basin Cleaning Program	Grounds Department	Reduce the frequency of catch basin cleaning.	Comprehensive catch basin cleaning was conducted by a contractor in July 2008. On-going inspection of catch	Continue annual monitoring of catch basins and outfalls to identify catch basins and outfalls in need of repair,

Revised				basins does not show cleaning required at this time. Anticipate new comprehensive cleaning of catch basins to occur in 2011 (3 year cleaning cycles).	and ensure timely repair of catch basins and outfalls when identified. In early 2010 the Medical Center identified the need to repair a few catch basins at the facility. Because VAMC construction monies are needed, the Medical Center has requested funding for this purpose. Currently waiting funding for repair of catch basins.
6.3.4	Street Sweeping Program	Grounds Department	Schedule street sweeping based on priority areas.	During Permit Years 3 thru 5 VAMC has significantly reduced the amount of sand used during winter road maintenance. This has resulted in a reduction of priority areas and the ability to maintain the system through a single annual facility-wide street sweeping program with additional street sweepings subject to intense weather conditions causing increase debris on VAMC roadways. Street sweepings and street leaf vacuuming were documented throughout 2009 and continue to be documented.	Continue to maintain Street Sweeping program and document the results.
Revised					
Revised					

6a. Additions

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7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) << if applicable >>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 7 (Reliance on non-municipal partners indicated, if any)	Planned Activities
Revised					
Revised					
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Revised					
Revised					
Revised					

7a. Additions

7b. WLA Assessment