



DEPARTMENT OF VETERANS AFFAIRS
Northampton VA Medical Center
Leeds, MA 01053-9764

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In Reply Refer to: 631/00

MAY 14 2009

May 11, 2009

Glenda Velez
U.S. EPA - CIP
1 Congress Street, Suite 1100
Boston, MA 02114

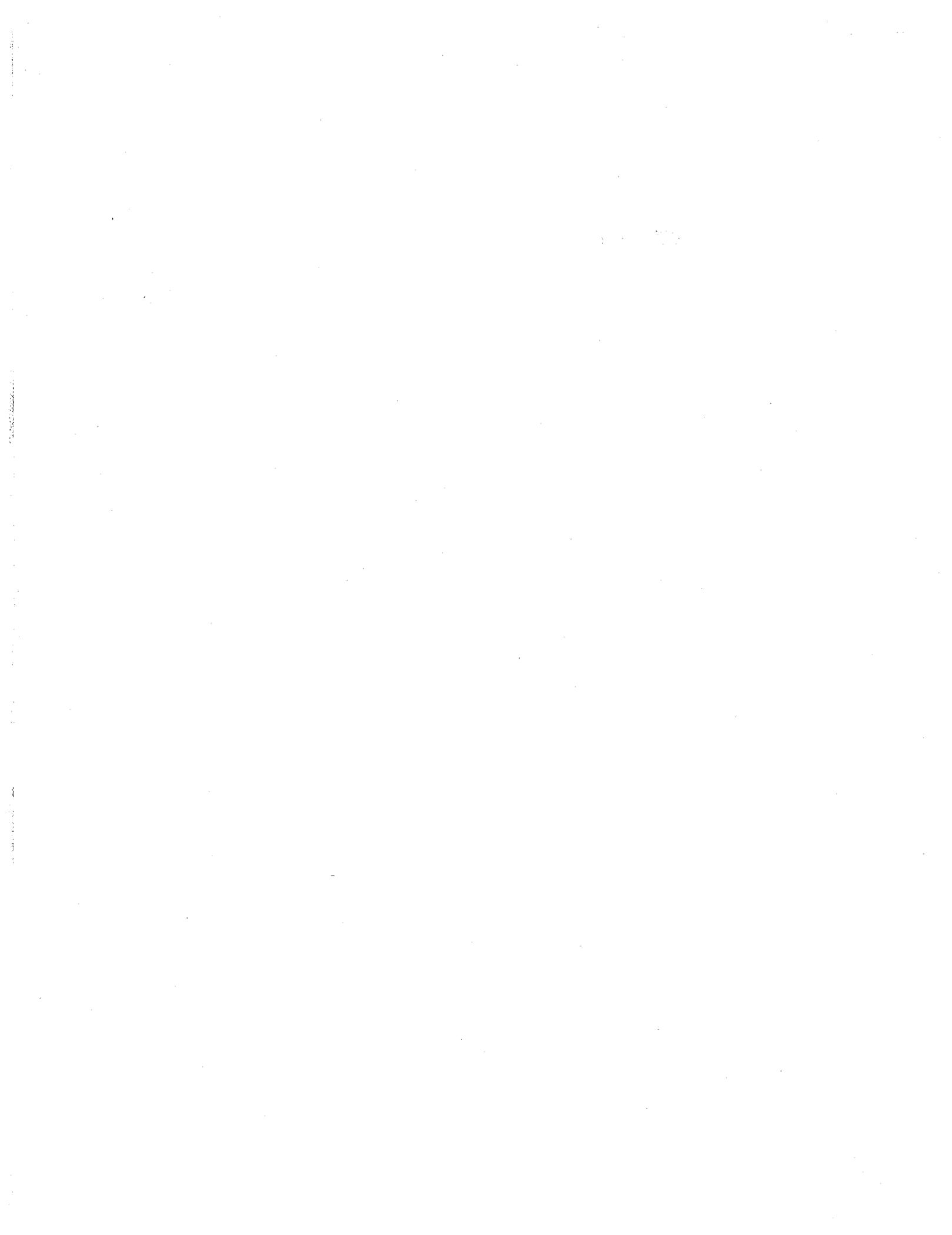
Dear Ms. Velez

Enclosed please the annual Storm Water Management Plan, Year 6 (April 1, 2008 – March 31, 2009) for Northampton VA Medical Center.

If you have any questions regarding this report, please contact James A. McPherson, Facilities Manager at (413) 582-3014.

A handwritten signature in black ink, appearing to read "Mary A. Dowling", is written over the printed name.

MARY A. DOWLING
DIRECTOR



Municipality/Organization: Northampton VA Medical Center
EPA NPDES Permit Number: MAR042026
MassDEP Transmittal Number: W-041170
Annual Report Number Year 6
& Reporting Period: April 1, 2008 – March 31, 2009

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2009)

Part I. General Information

Contact Person: James A. McPherson **Title:** Facilities Program Manager
Telephone #: (413) 582-3014 **Email:** James.McPherson@va.gov
Mailing Address: 421 North Main Street, Leeds, MA 01053-9764

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: MARY A. DOWLING

Title: Director

Date: May 11, 2009

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 governing 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 6.

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 non-municipal partners indicated, if any)	Planned Permit Year 6
1.3.1	Public Education Materials	GEMS Coordinator	Develop a stormwater section for the Patient Handbook.	Communication of stormwater awareness to all stakeholders (employees, patients, visitors, contractors, etc.) tapered off a bit during Permit Year 6 because of staff vacancies and realignment of departments.	Continue the communication through electronic means.
Revised			<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>		Continue stormwater awareness to patients and visitors through Infomatix Expo.
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 comprehensive training and incorporate lessons learned.

Revised			Present comprehensive stormwater training in addition to incorporation of stormwater awareness topics in other environmental program trainings.		
1.3.2	Storm Drain Identification Program	GEMS Coordinator	Identify and mark all stormwater catch basins in the VAMC MS4.	Seasonal snow-plowing activities appear to be primary reason for damaged/missing Drains to River medallions.	Continue with on-going inspection and replacement of damaged or missing medallions (as needed).
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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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 5 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 5 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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
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 5.	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 5 VAMC continued review of original stormwater policy that was issued during Permit Year 2 with the intent of publishing a comprehensive stormwater management program policy that addresses all stormwater requirements to include but not limited to: specific prohibitions, delegation of roles and responsibilities, communication and training, contractor roles and responsibilities, enforcement, consequences of non-compliance.	Publish revised comprehensive VAMC Stormwater policy and communicate policy to employees, visitors and other stakeholders as appropriate.
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 5 documentation of catch basin and outfall inspections showed no illicit discharges. While quarterly inspections are occurring, documentation is lacking.	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 5.	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 5, 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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
4.2.1 Revised	Regulatory Controls	Facilities Management Program	Erosion and sediment control specifications.	Erosion and sedimentation control techniques were incorporated into the construction contract for the Steam Line Project.	Continue with inclusion of sedimentation control techniques in construction, demolition and renovation projects, regardless of total land disturbance.
4.2.2 Revised	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.
4.2.3 Revised	Enforcement Procedures	GEMS Coordinator / Facilities Management Program	Contractor accountability and immediate correction of inadequate erosion and sediment control structures	Enforcement of contract specifications through Facilities Management Program Director and the VAMC Contracting Officer.	Continued enforcement.
4.2.4 Revised	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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
5.3.1 Revised	Structural Stormwater Controls	GEMS Coordinator / Facilities Management Program	Identify structural controls in design documents and contract specifications	During Permit Years 1 thru 5 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.
5.3.2 Revised	Stormwater Policy	GEMS Coordinator	Stormwater policy should focus on preserving surface water quality.	The VAMC stormwater policy was issued during Permit Year 2. Evaluation of this BMP has determined that the existing policy lacks specific prohibitions and delegation of roles and responsibilities. During Permit Year 4, responsibility for the revision and communication of the policy was delegated to the GEMS Coordinator.	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.
5.3.3 Revised	Planning Strategies	GEMS Coordinator / Facilities Management Program	Develop planning strategies that focus on avoiding sensitive areas for development.	During Permit Years 1 thru 5 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					

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
6.3.1 Revised	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 5 GEMS Coordinator 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.
6.3.2 Revised	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.	Continue to maintain program and monitor program to ensure oil does not enter stormwater catch basins.
6.3.3 Revised	Catch Basin Cleaning Program	Grounds Department	Reduce the frequency of catch basin cleaning.	While frequency of catch basin cleaning had been reduced in Years 3 and 4 because of reduction of sediment Year 5 showed come catch basins in need of cleaning. Because of this, VAMC will contract in Year 6 to have all catch basins and outfalls professional inspected and cleaned by third party contract.	Continue annual monitoring of catch basins and outfalls to identify catch basins and outfalls in need of repair, and ensure timely repair of catch basins and outfalls when identified.
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	Continue to maintain Street Sweeping program and document the results.

Revised							
Revised							
Revised							

6a. Additions

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 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
Revised					

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

Part V. Program Outputs & Accomplishments (OPTIONAL)

(Since beginning of permit coverage unless specified otherwise by a **, which indicates response is for period covering April 1, 2006 through March 31, 2007)

Programmatic

	(Preferred Units)	Response
Stormwater management position created/staffed	(y/n)	
Annual program budget/expenditures **	(\$)	
Total program expenditures since beginning of permit coverage	(\$)	
Funding mechanism(s) (General Fund, Enterprise, Utility, etc)		

Education, Involvement, and Training

Estimated number of property owners reached by education program(s)	(# or %)	
Stormwater management committee established	(y/n)	
Stream teams established or supported	(# or y/n)	
Shoreline clean-up participation or quantity of shoreline miles cleaned **	(y/n or mi.)	
Shoreline cleaned since beginning of permit coverage	(mi.)	
Household Hazardous Waste Collection Days		
<ul style="list-style-type: none"> ▪ days sponsored ** ▪ community participation ** ▪ material collected ** 	(#)	
School curricula implemented	(# or %)	
	(tons or gal)	
	(y/n)	

Legal/Regulatory

	In Place Prior to Phase II	Reviewing Existing Authorities	Drafted	Draft in Review	Adopted
Regulatory Mechanism Status (indicate with "X")					
▪ Illicit Discharge Detection & Elimination					
▪ Erosion & Sediment Control					
▪ Post-Development Stormwater Management					
Accompanying Regulation Status (indicate with "X")					
▪ Illicit Discharge Detection & Elimination					
▪ Erosion & Sediment Control					
▪ Post-Development Stormwater Management					

Mapping and Illicit Discharges

	(Preferred Units)	Response
Outfall mapping complete	(%)	
Estimated or actual number of outfalls	(#)	
System-Wide mapping complete (complete storm sewer infrastructure)	(%)	
Mapping method(s)		
▪ Paper/Mylar	(%)	
▪ CADD	(%)	
▪ GIS	(%)	
Outfalls inspected/screened **	(# or %)	
Outfalls inspected/screened (Since beginning of permit coverage)	(# or %)	
Illicit discharges identified **	(#)	
Illicit discharges identified (Since beginning of permit coverage)	(#)	
Illicit connections removed **	(#); and (est. gpd)	
Illicit connections removed (Since beginning of permit coverage)	(#); and (est. gpd)	
% of population on sewer	(%)	
% of population on septic systems	(%)	

Construction

	(Preferred Units)	Response
Number of construction starts (>1-acre) **	(#)	
Estimated percentage of construction starts adequately regulated for erosion and sediment control **	(%)	
Site inspections completed **	(# or %)	
Tickets/Stop work orders issued **	(# or %)	
Fines collected **	(# and \$)	
Complaints/concerns received from public **	(#)	

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	
Site inspections (for proper BMP installation & operation) completed **	(# or %)	
BMP maintenance required through covenants, escrow, deed restrictions, etc.	(y/n)	
Low-impact development (LID) practices permitted and encouraged	(y/n)	

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets) **	(times/yr)	
Average frequency of catch basin cleaning (commercial/arterial or other critical streets) **	(times/yr)	
Qty of structures cleaned **	(#)	
Qty. of storm drain cleaned **	(%, LF or mi.)	
Qty. of screenings/debris removed from storm sewer infrastructure **	(lbs. or tons)	
Disposal or use of screenings (landfill, POTW, compost, beneficial use, etc.) **	(location)	

Basin Cleaning Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	
• Hourly or per basin contract rate **	(\$/hr or \$ per basin)	
• Disposal cost**	(\$)	
Cleaning Equipment		
• Clam shell truck(s) owned/leased	(#)	
• Vacuum truck(s) owned/leased	(#)	
• Vacuum trucks specified in contracts	(y/n)	
• % Structures cleaned with clam shells **	(%)	
• % Structures cleaned with vacor **	(%)	

(Preferred Units)	Response
Average frequency of street sweeping (non-commercial/non-arterial streets) **	(times/yr)
Average frequency of street sweeping (commercial/arterial or other critical streets) **	(times/yr)
Qty. of sand/debris collected by sweeping **	(lbs. or tons)
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) **	(location)
Annual Sweeping Costs	
• Annual budget/expenditure (labor & equipment)**	(\$)
• Hourly or lane mile contract rate **	(\$/hr. or In mi.)
• Disposal cost**	(\$)
Sweeping Equipment	
• Rotary brush street sweepers owned/leased	(#)
• Vacuum street sweepers owned/leased	(#)
• Vacuum street sweepers specified in contracts	(y/n)
• % Roads swept with rotary brush sweepers **	%
• % Roads swept with vacuum sweepers **	%

Reduction (since beginning of permit coverage) in application on public land of:
 ("N/A" = never used; "100%" = elimination)

▪ Fertilizers	(lbs. or %)	
▪ Herbicides	(lbs. or %)	
▪ Pesticides	(lbs. or %)	
Integrated Pest Management (IPM) Practices Implemented	(y/n)	

	(Preferred Units)	Response
Average Ratio of Anti-/De-Icing products used ** (also identify chemicals and ratios used in specific areas, e.g., water supply protection areas)	% NaCl % CaCl ₂ % MgCl ₂ % CMA % K _{ac} % KCl % Sand	
Pre-wetting techniques utilized **	(y/n or %)	
Manual control spreaders used **	(y/n or %)	
Zero-velocity spreaders used **	(y/n or %)	
Estimated net reduction or increase in typical year salt/chemical application rate	(±lbs/ln mi. or %)	
Estimated net reduction or increase in typical year sand application rate **	(±lbs/ln mi. or %)	
% of salt/chemical pile(s) covered in storage shed(s)	(%)	
Storage shed(s) in design or under construction	(y/n or #)	
100% of salt/chemical pile(s) covered in storage shed(s) by May 2008	(y/n)	

Water Supply Protection

Storm water outfalls to public water supplies eliminated or relocated	# or y/n
Installed or planned treatment BMPs for public drinking water supplies and their protection areas	# or y/n
<ul style="list-style-type: none"> • Treatment units induce infiltration within 500-feet of a wellhead protection area 	# or y/n