

**Year 3 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: July 1, 2020-June 30, 2021**

*\*\*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, 2020 and June 30, 2021 unless otherwise requested.*

**Part I: Contact Information**

Name of Municipality or Organization: VA Central Western MA Healthcare System Edward P Boland VA Medical Center  
EPA NPDES Permit Number: MAR042026

**Primary MS4 Program Manager Contact Information**

Name: Robert E. Michalik Title: Environmental Protection Specialist / GEMS  
Street Address Line 1: Lake Building (Building 7), Room 107  
Street Address Line 2: 421 North Main Street  
City: Leeds State: MA Zip Code: 01053  
Email: Robert.Michalik@va.gov Phone Number: 413-584-4040 ext. 2330

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): Building 7, Room 107, 421 North Main Street, Electronic copy available on Internal Intranet page (not accessible outside organization).  
Date SWMP was Last Updated: Aug 1, 2019  
If the SWMP is not available on the web please provide the physical address:  
VA CWM, Building 7, Room 107, 421 North Main Street, Leeds, MA 01053

## 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>

<b>Impairment(s)</b>			
<input checked="" type="checkbox"/>	Bacteria/Pathogens	<input type="checkbox"/>	Chloride
<input type="checkbox"/>	Solids/ Oil/ Grease (Hydrocarbons)/ Metals	<input type="checkbox"/>	Nitrogen
		<input type="checkbox"/>	Phosphorus
<b>TMDL(s)</b>			
<i>In State:</i>	<input type="checkbox"/>	Assabet River Phosphorus	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	Charles River Watershed Phosphorus	<input type="checkbox"/>
			<input type="checkbox"/>
			Cape Cod Nitrogen
<i>Out of State:</i>	<input type="checkbox"/>	Bacteria/Pathogens	<input type="checkbox"/>
	<input type="checkbox"/>	Metals	<input checked="" type="checkbox"/>
			<input type="checkbox"/>
			Phosphorus
<input type="button" value="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 3 Requirements

- Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
- Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
- Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

*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 3 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:

### 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:

No new SSO's during this reporting period.

- 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 system map due in year 2 as necessary
- 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, 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:

SWPPPs for VA CWM Grounds Department garage and other solid waste storage locations (Solid Waste, C&D and Recycling) will be developed during Permit Year 4.

## **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:

VA CWM does not issue dog licenses. VA CWM does not operate septic systems.

## **Nitrogen** (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

### Annual Requirements

#### *Public Education and Outreach\**

- Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

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

#### *Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

#### *Potential structural BMPs*

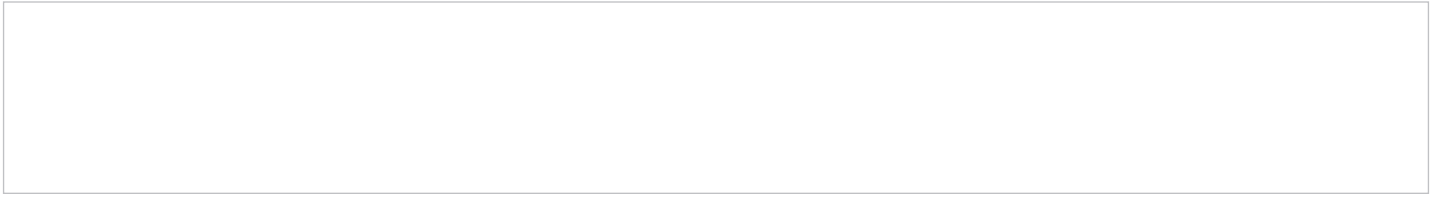
Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was

estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

*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:

*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:

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: Bacteria Contamination - Proper Pet Waste Management**

Message Description and Distribution Method:

Stormwater Awareness - Proper Management of Pet Waste. (Scoop the Poop)  
This was sent as an email message to all VA CWM employees.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Educational Message delivered to all employees via "All Employee" Email Message. Feedback from a few employees via email. Comments of appreciation were received from Contractors and local neighbors that observed the stormwater "Environmental 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:

Educational message was added to the VA CWM electronic sign at the entrance of the facility to capture all forms of "Public" to include local town residents and commuters.

#### **BMP: Leaf Litter / Nitrogen Contamination Awareness**

Message Description and Distribution Method:

Stormwater Awareness - Leaf litter can contribute to increased Nitrogen levels in Stormwater. Please keep catch basins clear of leaf litter.

Message delivered to all employees via "All Employee" Email Message. Additionally, VA CWM utilized an Electronic message board at the entrance of the property to ensure messages were available for Contractors, Patients and Visitors. Moreover, this mode of educational message delivery provided all commuters traveling past the facility with an educational message as well.

Targeted Audience:

Responsible Department/Parties:

## Measurable Goal(s):

Educational Message delivered to all employees via "All Employee" Email Message. Feedback from a few employees via email. Comments of appreciation were received from Contractors and local neighbors that observed the stormwater "Environmental Message".

Message Date(s): 10/5/2020

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:

Added the employment of an electronic sign at the entrance of the facility to capture all forms of "Public" to include local town residents and commuters.

**BMP: Lawn Care / Nitrogen Contamination - Spring Fertilizer Application/ Grass Clippings Disposal**

## Message Description and Distribution Method:

Stormwater Awareness - Spring Applications of fertilizer and Proper Management of Grass Leaf Clippings. Message delivered to all employees via "All Employee" weekly bulletin via email message. Additionally, VA CWM utilized an Electronic message board at the entrance of the property to ensure messages were available for Contractors, Patients and Visitors.

Targeted Audience: VA CWM Public (Employees, Patients, Visitors and Contractors) as well as general public

Responsible Department/Parties: GEMS Program Manager/ VA CWM Public Affairs

## Measurable Goal(s):

Educational Message delivered to all employees via "All Employee" Email Message. Feedback from a few employees via email. Comments of appreciation were received from Contractors and local neighbors that observed the stormwater "Environmental Message".

Message Date(s): 4/19/2021

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:

Additional use of electronic sign at the entrance of the facility to capture all forms of "Public" to include local town residents and commuters as well as employees, contractors, patients and visitors.

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:**

Hard Copy of the VA CWM Stormwater Management Plan is available in the GEMS Program Manager's Office. Additionally, an electronic copy is available via VA Intranet. There are opportunities for employees to provide comment during annual training.

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:**

VA CWM continued to use an electronic informational sign at the entrance of the facility to capture all forms of "Public" (Employees, Patients, Contractors and Visitors) involvement to include local town residents and commuters. This additional management practice provided for a greater dissemination of Annual Educational Stormwater Awareness Messages by expanding upon target audiences to include the general public as well.

### **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:*

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. 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:

VA CWM, Building 7, Room 107, 421 North Main Street, Leeds, MA 01053

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

Number of outfalls screened: 7

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

Percent of outfalls screened: 100

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

### **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: 0

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

Percent of total catchments investigated: 1

*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:

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:

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:

Total number of illicit discharges removed:

*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**:

IDDE Management Training  
 Annual Stormwater Awareness Training  
 Three (3) Annual Stormwater Awareness Messages delivered.

### **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:

Stormwater Inspections conducted for: Exterior Site Improvement Project, Residential Quarters Demolition Project, Building 20 Renovation Project, Building 9 Outdoor Recreation Area, Greenhouse Move, Primary Care Renovation and Legionella/Water Distribution Project.

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

### As-built Drawings

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

Number of as-built drawings received:

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

Submission of as-built drawings are required as part of VA CWM Engineering Specifications and Statements of Work (S.O.W.s) and will be provided timely subsequent to the completion of each project.

### 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:

Current Project in progress to expand parking capabilities. New parking lot will integrate a Healing Garden to manage as much stormwater as possible on-site. (EPA Soak-It up Campaign).

### 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:

### 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:

N/A

## 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:

Number of catch basins cleaned:

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

*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:

N/A

**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:  [Select Units]

Weight of material removed:  [Select Units]

**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:

N/A

**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 3 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 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

#### 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)

Provide any additional details on activities planned for permit year 4 below:

VA CWM will continue to use a service contract to provide for comprehensive Annual Catch Basin Cleaning.

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## 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:

Paul Babin

Title:

Chief FMS

Signature:

Paul T Babin  
1435712Digitally signed by Paul T Babin  
1435712  
Date: 2021.09.28 10:37:56 -04'00'

Date:

09/28/21

*[Signatory may be a duly authorized representative]*