

**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: Veterans Affairs Boston Healthcare System West Roxbury Campus

EPA NPDES Permit Number: MAR042011

**Primary MS4 Program Manager Contact Information**

Name: John Hughes Title: GEMS Program Manager

Street Address Line 1: 1400 VFW Parkway

Street Address Line 2: N/A

City: West Roxbury State: MA Zip Code: 02132

Email: John.Hughes5@va.gov Phone Number: 774-826-2345

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): <https://www.boston.va.gov/about/index.asp>

Date SWMP was Last Updated: June 2021

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

VA Boston Healthcare System-West Roxbury, 1400 VFW Parkway, West Roxbury, MA 02132. SWMP is posted on VA website. VA does not post management documents on external websites.

## 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 type="checkbox"/>	Bacteria/Pathogens	<input type="checkbox"/>	Chloride
<input type="checkbox"/>	Solids/ Oil/ Grease (Hydrocarbons)/ Metals	<input type="checkbox"/>	Nitrogen
<input type="checkbox"/>		<input type="checkbox"/>	Phosphorus
<b>TMDL(s)</b>			
<i>In State:</i>	<input type="checkbox"/>	Assabet River Phosphorus	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>	Charles River Watershed Phosphorus	<input type="checkbox"/>
	<input type="checkbox"/>	Lake and Pond Phosphorus	<input type="checkbox"/>
<i>Out of State:</i>	<input type="checkbox"/>	Bacteria/Pathogens	<input type="checkbox"/>
	<input type="checkbox"/>	Metals	<input type="checkbox"/>
	<input type="checkbox"/>	Nitrogen	<input 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:

N/A

### 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:

N/A

- 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:

Unable to conduct facility IDDE training to involved employees due to COVID-19 Operations and restrictions. O&M programs are currently being developed and will be completed by the end of 2021. Maintenance procedures will be included in O&M program Standard Operating Procedures.

## **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:

As a non-traditional MS4, West Roxbury does not provide information to septic system owners. West Roxbury has also created pamphlets for dog walkers on campus, however, we do not hand them out during dog licensing.

**Charles River Watershed Phosphorus TMDL**

- Completed the funding source assessment

*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:

The West Roxbury Phosphorus Control Plan is currently in progress and will be completed by the end of Permit Year 5.

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

N/A

### **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: Storm Drain Awareness**

Message Description and Distribution Method:

Provided information on the importance of keeping storm drains clear of trash, pet waste, and leaves.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Dissemination of educational messaging related to applicable bacteria/pathogen impacts within permit time frames and frequencies. No visible pet waste present on grounds or within MS4 infrastructure.

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:

[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**:

Due to COVID-19 Operations, SWMP development feedback from various VA personnel involved in activities that relate to MS4 operations was conducted through video sessions such as MS Teams, WebEx, and Zoom meetings. All were related to construction inspections, Project Management engagement, conversations

with leadership, and review of local, state, and federal regulatory initiatives and environmental conditions.

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**:

None were conducted due to COVID-19 Operations and restrictions.

### **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:

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

Number of outfalls screened:

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

Percent of outfalls screened:

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

Interconnection screening conducted on June 17, 2020. All interconnections were screened and observed to be dry. There are no outfalls located on VA WR property.

### **Catchment Investigations**

*If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

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

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

Catchment investigations were conducted between June 17 and June 19, 2020. All catchments were investigated during this period.

### **IDDE Progress**

*If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.*

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

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period.*

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:  gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018)**.*

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

N/A

### **Employee Training**

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

All new employees receive training during New Employee Orientation. Employees receive general awareness training during department meetings. Staff also received specific training on the IDDE Program Manual contents and how to conduct field screening/sampling activities in July 2019. Stormwater training is provided in conjunction with our SPCC training once per year. Due to COVID-19, we were unable to provide face-to-face training with employees.

### **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:

The VABHS West Roxbury performs site plan reviews, inspections, and enforcement actions (if required) on all construction sites, which is more stringent than the permit requirement. Minor infractions observed during site inspections were conveyed verbally to the contractor and resolved within a 24-hour period of their discovery.

### **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:

VA West Roxbury is working towards obtaining as-builts for submission via Engineering.

**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:

West Roxbury is continuing to work through this assessment with Engineering.

**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:

West Roxbury is continuing to work through this report with Engineering.

**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:

One crushed stormwater pipe was identified during CCTV data gathering and is scheduled to be repaired in an upcoming large-scale Boiler Plant project.

**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:

West Roxbury has not come across this as we inspect each catch basin twice per year.

### **Street Sweeping**

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

- Number of miles cleaned:
- Volume of material removed:
- Weight of material removed:

### **Stormwater Pollution Prevention Plan (SWPPP)**

*Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period**.*

Number of site inspections completed:

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

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):

N/A

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:

N/A

### **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:

N/A

### **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:

Annual Training. Attempted to conduct Video conferencing/MS Teams training, but due to the Hospital's COVID-19 Operations and the number of Teleworker employees, not all staff have been trained.

### **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:

## 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:

John Hughes

Title:

Lead GEMS Program Manager

Signature:

John D. Hughes  
1399212



Digitally signed by John D.  
Hughes 1399212  
Date: 2021.09.27 15:20:37 -04'00'

Date:

09/27/21

*[Signatory may be a duly authorized  
representative]*