

AH (Tewksbury Hospital) MAR0430054
The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street, Boston, MA 02108-4619

MAR043004
Mass.
Hospital
School

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Thelma Murphy
United States Environmental Protection Agency
Region 1
Office of Ecosystem Protection
1 Congress St, Suite 1100 (CMU)
Boston, MA 02114-2023

JUL 31 2003
MUNICIPAL ASSISTANCE UNIT

July 25, 2003

Dear Ms. Scarlett and Ms. Murphy:

Attached is a new Notice of Intent (NOI) for coverage under the NPDES general stormwater permit for small MS4s for two Massachusetts Department of Public Health (MDPH) facilities. Please use this information and the new certifications instead of the items submitted for the previous March 10, 2003 deadline. As these are "nontraditional" MS4 facilities, we would like to take the opportunity to further explain some of the information contained in these applications.

The Massachusetts Department of Public Health properties include four hospital facilities. Based on the criteria in the general permit, and discussions with EPA, we have determined that two of these facilities (Tewksbury Hospital in Tewksbury, and Massachusetts Hospital School in Canton) are required to get coverage under the general permit for small MS4s. We have applied to EPA for a determination of "non applicability" for Lemuel Shattuck

Hospital in Jamaica Plain, and have applied for, and received, a waiver for the Western Massachusetts Hospital in Westfield.

We are now submitting an NOI for the two other campus-type hospital facilities. While the mix of specific programs is different at each facility, all of them have a number of separate state and non-governmental organizations (NGOs) using the buildings and grounds along with the MDPH functions. We have tried to select our best management practices (BMPs) to identify and address the different audiences. We intend that during the first five-year permit term, some of the BMPs we have selected will become more specific as we identify the most appropriate audiences and methods of achieving overall water quality improvements. Additional information will be elucidated in each yearly report required by the permit.

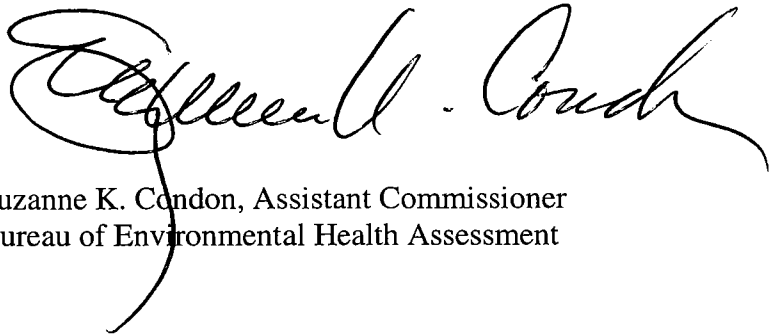
Much of the work to be carried out for this permit will be undertaken by specific departments at each of the facilities. These are identified in each BMP listing in the permit by department name. The Facilities department is typically responsible for the physical functioning of all aspects of the facility and is key in all other environmental compliance activities. The Human Resources department is responsible for employee hiring, training and communication. Some of the BMP activities will be performed more centrally, for all facilities, or in coordination with the central DPH office; these include BMPs where the responsible party listing includes "compliance officer."

Generally, major construction and renovation projects at our facilities are not under direct agency control. The Division of Capital Asset Management (DCAM) is responsible for financing and overseeing projects of that approach or exceed a million dollars. Any projects which we would anticipate could exceed the one-acre footprint which triggers the construction requirements would be DCAM projects. Therefore, we have listed "working with DCAM" as the primary BMP under category 4. Relevant DCAM staff are aware of their significant role in this process and have already started making changes to their contract language for stormwater compliance. We have already discussed this issue with them relative to our NOI filing. DCAM will also have significant involvement in the development of post-construction stormwater controls, although operation and maintenance of any such will become the facilities responsibility. Other BMPs requiring significant capital funding will also require DCAM assistance. The state's Operational Services Division (OSD) oversees contracting for the state; we are committing to working with them to ensure that relevant contracts, such as those for

landscaping, vehicle maintenance, and supply purchasing have suitable mechanisms to help the facilities achieve stormwater control.

We hope that this information is helpful to you in reviewing the attached NOIs. If you have additional questions relative to this application, or require more specific information, please feel free to contact Ruth Alfasso, of our Bureau, at (617) 624-5757.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne K. Condon". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail that extends downwards and to the left.

Suzanne K. Condon, Assistant Commissioner
Bureau of Environmental Health Assessment

cc. Elaine T. Krueger, Director, Environmental Toxicology, BEHA
Ruth Alfasso, Compliance Officer, BEHA
James Ballin, Deputy General Counsel
Sarah Bachrach, Hospital Bureau
Phil McCauley, Hospital Bureau
Raymond Sanzone, CEO, Tewksbury Hospital
William Kelleher, Facilities, Tewksbury Hospital
Phil Dould, Acting CEO, Mass Hospital School
Rick Pollara, Facilities, Mass Hospital School

Attachments: NOI for Tewksbury Hospital, DEP transmittal #W035389
NOI for Massachusetts Hospital School, DEP transmittal #035181



Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

W035181

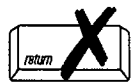
Transmittal Number

BRP WM 08A NPDES Stormwater General Permit
Notice of Intent for Discharges from Small Municipal Separate
Storm Sewer Systems (MS4s)

Facility ID (if known)

A. Instructions

Important:
When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Submission of this Notice of Intent constitutes notice that the entity named at item B1. of this form intends to be authorized by the DEP General Permit issued jointly with EPA for stormwater discharges from the small municipal separate storm sewer system (MS4), in the location identified at item B2. of this form. Submission of the Notice of Intent also constitutes notice that the party identified at item B1. has read, understands and meets the eligibility conditions of Part I.B. of the NPDES Small MS4 General Permit, agrees to comply with all applicable terms and conditions of the NPDES Small MS4 General Permit, and understands that continued authorization to discharge is contingent on maintaining eligibility for coverage. **In order to be granted coverage, all information required on BRP WM 08A, including the Stormwater Management Program Summary and Time Frames form, must be completed. Please read the permit and make sure you comply with all requirements, including the requirement to develop and implement a stormwater management program.**

B. Applicant Information

1. Small MS4 Operator/Owner Information:

Massachusetts Hospital School, Phil Dould, Acting CEO

Name

3 Randolph St.

Mailing Address

Canton

City/Town

(781) 828-2440

Telephone Number

MA

State

Email (if available)

2. Municipality Name

Canton

City/Town

3. Legal Status:

☐ Federal

☐ City/Town

☒ State

☐ Tribal

☐ Private

☐ Other public entity:

Specify Public Entity

4. Other regulated MS4(s) within municipal boundaries:

This MS4 is wholly enclosed within the town of Canton, itself a small MS4

5. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for "listed species" and critical habitat been met?

☒ yes

☐ pending

☐ no

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B. Applicant Information (cont.)

6. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for protection of historic properties been met?

☒ yes ☐ pending ☐ no

Note:
Section C may
be duplicated to
accommodate a
larger list of
receiving waters

C. Names of (Presently Known) Receiving Waters

[illegible]



Massachusetts Department of Environmental Protection
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Transmittal Number

Facility ID (if known)

D. Stormwater Management Program Summary

1. Public Education:

B1-1

BMP ID #

Brochure development and
distribution
Specify Best Management Practice

Facilities Management and
Human Resources
Responsible Dept./Person Name

Design educational brochure and
distribute to all staff, visiting
groups and others
Specify Measurable Goal

B1-2

BMP ID #

Identify all groups using facility for
targeting information, notices.
Specify Best Management Practice

Facilities Management and
Human Resources
Responsible Dept./Person Name

List of groups with contact names
and contact information (to be
updated yearly)
Specify Measurable Goal

B1-3

BMP ID #

Integrate education and good
housekeeping into orientation and
yearly training materials
Specify Best Management Practice

Facilities Management and
Human Resources
Responsible Dept./Person Name

All new staff get training materials
on hazardous materials,
stormwater, as part of orientation.
Records kept with personnel files.
Specify Measurable Goal

B1-4

BMP ID #

Develop Curriculum for School on
stormwater
Specify Best Management Practice

Facilities Management and
Teachers to be determined
Responsible Dept./Person Name

Stormwater issues added to
existing environmental curriculum.
Handouts to be developed for
distribution
Specify Measurable Goal

B1-5

BMP ID #

Guest speaker on stormwater and
other environmental issues
Specify Best Management Practice

Facilities Management and
Compliance Officer
Responsible Dept./Person Name

One presentation with handouts
and/or posters. May be done in
coordination with other DPH
facilities
Specify Measurable Goal

2. Public Participation:

(There is overlap between items under 1 and 2)

B2-1

BMP ID #

Compile list of existing related
activities (several occur on
campus regularly each year)
Specify Best Management Practice

Facilities Management and
Human Resources
Responsible Dept./Person Name

List of activities, with organization
and contacts
Specify Measurable Goal

B2-2

BMP ID #

Publicize existing local
environmental/watershed groups
Specify Best Management Practice

Facilities Management and
Human Resources
Responsible Dept./Person Name

Brochures available in existing
rack locations
Specify Measurable Goal



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D. Stormwater Management Program Summary (Cont.)

B2-3

BMP ID #

Stormwater stencil day
Specify Best Management Practice

Facilities Management and
Human Resources
Responsible Dept./Person Name

Stencil all drains on campus with
appropriate language
Specify Measurable Goal

B2-4

BMP ID #

Coordinate with town of Canton
Specify Best Management Practice

Facilities Management and
Compliance Officer
Responsible Dept./Person Name

At least one face-to-face meeting
with relevant municipal staff on
stormwater issues
Specify Measurable Goal

3. Illicit Discharge Detection and Elimination:

B3-1

BMP ID #

Compile maps and other info of
existing stormwater systems
Specify Best Management Practice

Facilities Management
Responsible Dept./Person Name

Maps in both large format and
standard handout size, showing
storm drains, outfalls with outfalls
numbered.
Specify Measurable Goal

B3-2

BMP ID #

Develop written SOP defining and
forbidding illicit connections
Specify Best Management Practice

Facilities Management and
Human Resources
Responsible Dept./Person Name

One or more written SOPs in
standard facility format
Specify Measurable Goal

B3-3

BMP ID #

Survey of campus buildings for
illegal connections
Specify Best Management Practice

Facilities Management
Responsible Dept./Person Name

All buildings checked
Specify Measurable Goal

B3-4

BMP ID #

Repair of any illicit connections
discovered (if any are found)
Specify Best Management Practice

Facilities Management
Responsible Dept./Person Name

Full sanitary/storm sewer
separation
Specify Measurable Goal

B3-5

BMP ID #

Survey of non-building areas for
illicit connections and control of
illegal dumping
Specify Best Management Practice

Facilities Management
Responsible Dept./Person Name

Full sanitary/storm sewer
separation
Specify Measurable Goal

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Storm Sewer Systems (MS4s)

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D. Stormwater Management Program Summary (Cont.)

4. Construction Site Runoff Control:

B4-1

BMP ID #

Work with DCAM to develop
contract language for new
construction

Specify Best Management Practice

B4-2

BMP ID #

Develop/implement training for
employees who oversee
construction activities

Specify Best Management Practice

B4-3

BMP ID #

Review with DCAM use of new
contract language and related
procedures

Specify Best Management Practice

Compliance Officer

Responsible Dept./Person Name

Achieve workable contract
language to effect stormwater
construction control

Specify Measurable Goal

Human Resources and Facilities
Management

Responsible Dept./Person Name

Portion of training program
discusses objectives for all
relevant staff (See also B1-3)

Specify Measurable Goal

Compliance Officer and Facilities
Management

Responsible Dept./Person Name

Memorandum describing current
use and potential changes

Specify Measurable Goal

5. Post Construction Runoff Control: (See also B2-4, B4-1 and B4-3 above and B6-1 below)

B5-1

BMP ID #

Codify maintenance of storm
drains and other control measures
Specify Best Management Practice

Compliance Officer and Facilities
Management

Responsible Dept./Person Name

Written SOPs for procedures and
frequency. May also involve use
of state CAMIS computerized
maintenance management
system

Specify Measurable Goal

6. Municipal Good Housekeeping:

B6-1

BMP ID #

Review relevant SOPs and work
practices for stormwater
management

Specify Best Management Practice

Facilities Management

Responsible Dept./Person Name

All work procedures with
relevance to stormwater will be
reviewed with changes made as
applicable

Specify Measurable Goal



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D. Stormwater Management Program Summary (Cont.)

B6-2

BMP ID #

Review all relevant statewide and facility contracts for appropriate language conforming to facility good housekeeping practice (includes waste disposal, vehicle and landscaping contracts)

Specify Best Management Practice

Facility Management, Contracting Department and Compliance Officer

Responsible Dept./Person Name

All contracts with potential relevance to stormwater will be reviewed, and changes made as applicable

Specify Measurable Goal

B6-3

BMP ID #

Discussion with town of Canton with potential to adopt some town BMPs

Specify Best Management Practice

Compliance Officer

Responsible Dept./Person Name

Meetings and review of documents, potential MOU or similar agreement.

Specify Measurable Goal

B6-4

BMP ID #

Refine procedures to target disposal of horse/goat manure and waste from pet walking

Specify Best Management Practice

Facility Management

Responsible Dept./Person Name

New work procedures and facilities to target these activities and materials

Specify Measurable Goal

B6-5

BMP ID #

Storm drain cleaning

Specify Best Management Practice

Facilities Management

Responsible Dept./Person Name

Targeted cleaning frequency to be determined

Specify Measurable Goal

7. BMPs for Meeting TMDL: Not applicable.

BMP ID #

Specify Best Management Practice

Responsible Dept./Person Name

Specify Measurable Goal

BMP ID #

Specify Best Management Practice

Responsible Dept./Person Name

Specify Measurable Goal

BMP ID #

Specify Best Management Practice

Responsible Dept./Person Name

Specify Measurable Goal

BMP ID #

Specify Best Management Practice

Responsible Dept./Person Name

Specify Measurable Goal

BMP ID #

Specify Best Management Practice

Responsible Dept./Person Name

Specify Measurable Goal



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E. 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.

Philip E. Doulo

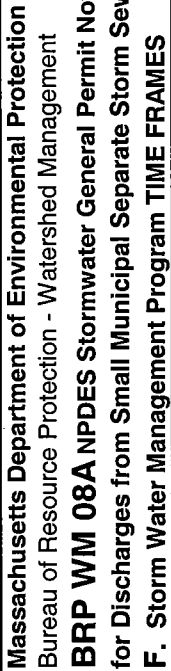
Printed Name

Philip E. Doulo

Signature

7/22/03

Date

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