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Municipality/Organization: ENRM VA Hospital
EPA NPDES Permit Number: BRP WM 08A
MassDEP Transmittal Number: W- 040896
Annual Reporting Year: 2011

NPDES PII Small MS4 General Permit
Annual Report
(Due: May 1, 2012)

General Information

Contact Person: Lili Griffin Title: Green Environmental Management System
(GEMS) Coordinator

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Mailing Address: 200 Springs Road Bedford, MA 01730

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:

Lili M. Griffin

Printed Name: Lili M. Griffin

Title: GEMS Coordinator

Date: April 27, 2012

April 27, 2012

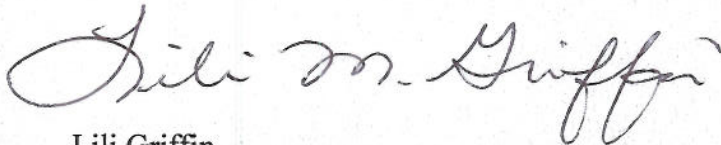
Glenda Velez
US EPA
5 Post Office Square – OEP06-01
Boston, MA 02109-3912

Fred Civian
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

Subject: 2011 Storm Water Management Annual Report for ENRM VA Hospital–Bedford, MA.

Please find attached our 2011 Storm Water Management Report. We value your involvement in our Storm Water Management Plan and hope that this report fits EPA and MA-DEP goals for improving the water quality of our nation's waterways.

Sincerely,

A handwritten signature in dark ink, reading "Lili M. Griffin". The signature is fluid and cursive, with the first name "Lili" being the most prominent.

Lili Griffin
Environmental Engineer
GEMS Coordinator
200 Springs Road
Bedford, MA 01730

Goal 1: Public Education and Outreach

- Annual mandatory environmental training (i.e., GEMS) continues as part of the training awareness to employees to report to the Safety Office any hospital activities that could impact the Shawsheen watershed (i.e, oil changes by employees in parking lots, leaks from vehicles, etc).
- Eight-Hour "Hazardous Waste Operations and Emergency Response" training to train workers how to contain and prevent hazardous materials from entering storm systems. Training scheduled in August 2012
- Existing Standard Operating Procedures for delivery of fuel oil are in place in case of spills and to ensure appropriate notification triggers.
- Construction projects which could impact storm water were reviewed on a case by case basis by the environmental engineer.
- Engineering was provided training on Massachusetts-specific storm water triggers for construction projects.

Goal 2: Public Participation/Involvement

- We are members of the Shawsheen Watershed Association so that we are aware of activities in the watershed and updates on water quality issues and monitoring activities.
- Any complaints from members of the public with regard to water quality issues or concerns would be provided to our Public Affairs officer. No complaints were received in 2010.

Goal 3: Illicit Discharge Detection and Elimination

- Our facility has received funding for a sewer line replacement project for the lower sections of pipe on the campus. It will be completed by the end of 2012. An additional project to replace the remaining deficient sanitary sewers has been submitted and is a \$ 2 million dollar project. The existing system is a separate system. If any cross-connections exist or repairs are needed, they will be identified as part of these construction projects.

Goal 4: Construction Site Runoff Control

- In 2011, there was a tuckpointing project which involved the removal of PCBs. Proper sediment and erosion controls were put in place as part of this project. No other major construction projects were completed in 2011 which required runoff controls.

Goal 5: Post Construction Runoff Control

- Construction is primarily interior renovation. No increases in storm water runoff were associated with construction projects. No major exterior construction is underway or planned at this time.

Goal 6: Pollution Prevention/Good Housekeeping

- The facility completed annual storm drainage/catch basin maintenance this year.
- Groundskeepers maintain clean grounds free of debris and trash. Good housekeeping is monitored by the environmental engineer and inspection teams who inspect each and every building throughout the year as part of hospital accreditation (i.e., Environment of Care).

Goal 7: Controlling Pollutants of Concern

- Our facility primarily drains to an unnamed creek which then drains to Spring Brook. Report MA83-01-2002-24, titled "Bacteria TMDL for the Shawsheen River Basin" did find exceedances within the Spring Brook tributary but the source of the contamination was not found. Our funding of a new sanitary sewer systems as previously discussed will identify any illicit discharges or interconnection issues. The Shawsheen River Basin does plan to do monitoring in 2012 for bacteria in upper Bedford watersheds but no results are posted on their website to date.
- We are in contact with environmental consultants who are monitoring any changes to the MS4 programs as they apply to us. At this time, we are continuing our goals of our existing permit until revised regulations are finalized.
- The use of commercial grade vinegar was purchased by grounds personnel and is working well to kill nuisance weeds (poison ivy, etc).
- Integrated Pest Management training was provided to all grounds personnel to increase awareness of the toxicity of herbicides.