



DEPARTMENT OF VETERANS AFFAIRS
Edith Nourse Rogers Memorial Veterans Hospital
200 Springs Road
Bedford, MA 01730

4/27/17

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April 25, 2017

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US EPA
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Fred Civian
Massachusetts Department of Environmental Protection
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Subject:
2017 Storm Water Management Annual Report
ENRM VA Hospital
Bedford, MA 01730

Please find attached the Bedford VA (ENRM VA Hospital) 2017 Storm Water Management Annual Report per EPA NPDES Permit Number: BRP WM 08A (Massachusetts DEP Transmittal Number: W040896). We look forward to working with your agencies in the future to improve the quality of our nation's waterways.

Sincerely,
Joe Kitko

A handwritten signature in blue ink that reads "Joseph E. Kitko".

Bedford VA GEMS Program Manager



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BEDFORD VA
2017 STORM WATER MANAGEMENT
ANNUAL REPORT

STORM WATER MANAGEMENT MINIMUM CONTROL MEASURES

1.1 Public Education and Outreach

Purpose: To address steps and/or activities that the community can take to reduce the pollutants in storm water runoff.

BMP #1: A catch basin inventory/stenciling project is in development and will be implemented throughout the campus.

Goal: Physically verify Geographic Information System (GIS) mapping of all storm water basins. Stencil the basins with public anti-pollution reminders.

Results:

- Anti-pollution stencils will be repainted in May 2017 on all storm basins along the sidewalks and roadways.
 - The Bedford VA GEMS Program hired a GEMS Technician in December 2016 to assist in accomplishing storm water management tasks.
 - GIS mapping will be updated in 2017 through a new VISN-wide (New England Regional VA) contract.
 - Bedford VA's onsite welder will be placing determined ID names on all iron/steel catch basin grates following the GIS mapping verification project.
 - New Wetlands signs will be posted throughout the campus at the 100 ft. boundary line per Bedford Conservation Commission requirements.
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1.2 Public Involvement and Participation

Purpose: To provide opportunity for the public to participate in the implementation and review of the storm water management program.

BMP #1: Reinstitute the Bedford VA Green Environmental Management System (GEMS) Committee.

Goal: The GEMS committee is composed of participants from various departments and clinics throughout the facility. The implementation of this committee will provide opportunities for public involvement in the review and implementation of the Storm Water Management Plan. Quarterly meetings will be conducted to review the plan and BMP activities.

Results:

- The GEMS Committee continually meets quarterly to review the progress of the BMP goals of the Storm Water Management Plan (SWMP).
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1.3 Illicit Discharge Detection and Elimination

Purpose: To detect and eliminate discharges to a storm drain that is not composed entirely of storm water, with the exception of those that are defined by the U.S. EPA as "allowable non-storm water discharges" listed in Part I.F. of the General Permit.

BMP #1: Train the Utility Systems Repair Operators (USROs) and facility spill prevention first responders on storm water management principles at the Bedford VA.

Goal: Develop and present storm water pollution control training to the Duty Engineering staff, USRO, to ensure adequate training is presented to staff members responding to incidents which may potentially contaminate the storm water discharge system. A refresher version of training will be presented at least annually.

Results:

- This training has been incorporated into an existing facility spill response training presented annually to First Responders. All newly hired USRO (Duty Engineer) members are also being trained in Bedford VA storm water pollution control measures.

BMP #2: Conduct an inventory of floor drains throughout the campus. A management plan will be developed to address any potential illicit discharges identified.

Goal: Ensure those that may be piped to the storm sewer system are plugged where there is a potential for a release of hazardous materials.

Results:

- This project involves multiple Services and continues to be in development phase.
- Until the assessment can be conducted, requesting that Engineering Services plug all floor drains located within each mechanical room of each building housing devices having potential to discharge petroleum/hydraulic oil or any other substance detrimental to storm water system, and all oil discharging devices shall have oil only pads placed underneath each discharge valve/location. A standard operating procedure (SOP) is being created for this task.

1.4 Construction Site Storm Water Runoff Control

Purpose: To reduce pollutants in any storm water runoff to the storm drains from construction activities that result in land disturbance of greater than or equal to one acre.

BMP #1: Train the Construction Engineering, Facility First Responders, and Safety staff on storm water management principles at the Bedford VA.

Goal: New employees are currently receiving this training. A modification of the training is in development for Construction Engineering, Facility First Responders, and Safety staff. Refresher training will be presented at least annually.

Results:

- Training postponed until the new GEMS Technician was onboard. Training will begin in May 2017.

BMP #2: Development and implementation of a storm water runoff control guidance procedure for construction projects and contractors to be completed in fiscal year 2016.

Goal: Storm water runoff control guidance procedures will be developed and distributed to all contractors performing construction work throughout the campus.

Results: Procedures are still in progress, and will be completed in May 2017.

1.5 Post Construction Storm Water Management in New Development and Redevelopment

Purpose: To address storm water runoff from new development and redevelopment projects that disturbs greater than one acre or less than one acre if the project is part of a large common plan of development.

BMP #1: Incorporate principles of storm water runoff control into Construction/Safety inspections performed by the site Engineers and Safety personnel at the completion of a project.

Goal: Storm water runoff control measures are inspected to the completion of a project.

Results:

- Erosion control issues for disturbed grounds, future landscaping measures, and post construction sedimentation clean-up continue to be addressed as priority matters during post construction inspections by site Engineers and Safety personnel. Erosion control concerns will also be addressed in the new storm water runoff control guidance procedures.
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1.6 Pollution Prevention and Good Housekeeping in Municipal Operations

Purpose: To prevent and/or reduce pollutant runoff from community/facility operations.

BMP #1: Implement storm water catch basin cleanout program.

Goal: To prevent the discharge of solids or contaminants collected within catch basins from road runoff and litter.

Results:

- A contractor continues to conduct monthly inspections, and performs catch basin cleaning as necessary. This task will soon be transferred to the newly hired GEMS Technician after adequate training has been conducted.