

Municipality/Organization: VA Boston Healthcare System - Brockton

EPA NPDES Permit Number:

MassDEP Transmittal Number: W-041327

Annual Report Number **Year 15**
& Reporting Period: **April 1, 2017 – March 31, 2018**

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2018)

Part I. General Information

Contact Person: John Hughes Title: GEMS Coordinator Brockton Div.

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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: *John D. Hughes*

Printed Name: John Hughes

Title: GEMS Coordinator Brockton Division

Date: 4/6/2018

Part II. Self-Assessment

The VA Boston Healthcare System – Brockton has completed the required self-assessment and has determined that our facility is in compliance with all permit conditions.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Planned Activities
1.3.1	Public Education Materials	GEMS Coordinator	Accumulate, develop, review, and update information for the Brockton campus.	Reviewed and updated fact sheets, educational materials and medical center policies to include information about storm water.	Update materials as needed.
Revised					
1.3.2	Training Programs	GEMS Coordinator	Develop, review and conduct annual general awareness training for Engineering staff and New Employee Orientation. Educate contractors prior to construction activities.	Conducted annual refresher awareness training for Engineering Staff and conducted basic awareness training during New Employee Orientation. Contractors are educated during pre-construction meetings.	Continue to review, update and conduct trainings.
Revised					
1.3.3	Storm Drain Identification Programs	GEMS Coordinator/Engineering	Develop, implement and maintain storm drain identification	Reviewed storm drain facility maps and updated as necessary.	Update map as needed.
Revised					
Revised					

a. Additions

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Planned Activities
2.3.1	“Keep-it-Clean” Awareness Program	GEMS Coordinator/Engineering	Volunteers to help keep campus clean	Volunteers and public service organizations donate time to clean grounds	Various volunteers and public service organizations donate time to clean grounds, plan to walk the perimeter to pick up trash.
Revised					
2.3.2	Partner w/City of Brockton,	GEMS Coordinator/Engineering	Form Partnerships	Continue Partnerships	Continue Partnerships
Revised					
2.3.2	Suggestion Box	GEMS Coordinator	Implement suggestion program	Suggestions for program enhancement can be submitted via GEMS “Green Box” on sharepoint site.	Continue suggestion feedback program.
Revised					
Revised					
Revised					

2a. Additions

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3.4.1.	Storm Drain Map	GEMS Coordinator/ Engineering	Update with any drainage additions	Storm drain map was reviewed and updated as needed.	Review and update storm drain map as necessary.
Revised					
3.4.2	VA Storm Water Policy for the Brockton Campus	GEMS Coordinator/ Engineering	Review storm water policy and management practices within other Medical Center policies.	Reviewed stormwater policy and stormwater management practices within Medical Center policies.	Contracted with a 3 rd Party Consultant to update Management Plans with new Stormwater Permit regulations.
Revised					
3.4.3	Illicit discharge detection program	GEMS Coordinator/ Engineering	Review campus stormwater map and scope of projects for illicit discharge connections.	No illicit discharge connections were discovered.	Continue to review campus stormwater map and scope of projects for illicit discharge connections.
Revised					
3.4.4	Illicit discharge elimination program	GEMS Coordinator/Engineering	Enforce stormwater policy to correct detected illicit discharges.	No illicit discharges were detected.	Continue to enforce stormwater policy to correct detected illicit discharges.
Revised					
Revised					

3a. Additions

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Planned Activities
4.2.1	Regulatory Controls	GEMS Coordinator/Project Engineers	Review contractual language and enhance if necessary	Reviewed all project contracts for stormwater management practices and made recommendations as necessary.	Continue to review all project contract language and enhance as necessary.
Revised					
4.2.2	Review and conduct site inspections	GEMS Coordinator/Project Engineers	Conduct routine onsite inspections of construction sites.	Conducted routine inspections of construction projects on a weekly basis.	Continue to conduct routine onsite inspections of construction sites.
Revised					
4.2.3	Enforcement procedures	GEMS Coordinator/Project Engineers	Provide feedback to Project Engineer and Contracting Officer for any noncompliance issues.	No significant noncompliance issues reported.	Continue to provide feedback on compliance status of projects.
Revised					
4.2.4	Procedures to record and address public comment	GEMS Coordinator	Maintain record of comments received and actions taken to address public concerns.	No public concerns were noted. Reviewed all project contracts for stormwater management practices and made recommendations as necessary.	Continue to maintain record of comments received and actions taken to address public concerns. Continue to review all project contract language and enhance as necessary.
Revised					
Revised					

4a. Additions

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Planned Activities
5.3.1	Structural storm water controls	GEMS Coordinator/ Project Engineers	Conduct post construction inspections of all projects	All projects have had post construction inspections	Conduct post construction inspections of all projects
Revised					
5.3.2	Storm water policy	GEMS Coordinator/ Engineering	Review stormwater policy as it relates to Engineering Maintenance and Construction activities	Reviewed existing Engineering & Maintenance policies and incorporated stormwater management practices where applicable. Stormwater management practices were written into construction documentation where applicable.	Continue to review stormwater policy as it relates to Engineering Maintenance and Construction activities
Revised					
Revised					
Revised					

5a. Additions

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Planned Activities
6.3.1	Employee training program	GEMS Coordinator	Update list of all relevant employee training programs	Reviewed and updated list of all employee training programs including New Employee Orientation, Engineering, EMS, GEMS and Safety	Continue to review and update employee training programs.
Revised					
6.3.2	Catch basin cleaning program	Engineering	Schedule annual catch basin cleaning and monitor volume removed.	Catch basins were cleaned in August and approximately 15 tons of materials were removed.	Schedule annual catch basin cleaning and monitor volume removed.
Revised					
6.3.3	Street sweeping program	Engineering	Coordinator campus street sweeping with Engineering Service	Campus street sweeping is completed in the spring and then again in the fall. The majority of the material is collected in the Spring with plans to recycle it on site.	Coordinator campus street sweeping with Engineering Service
Revised					
Revised					
Revised					

6a. Additions

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 15 (Reliance on non-municipal partners indicated, if any)	Planned Activities
7.2.1	Storm water Discharge Testing Program	GEMS Coordinator/Engineering	Assess TMDL's and perform sampling if necessary.	No sampling was conducted.	Contracted with 3 rd Party Consultant to assist in evaluating if any new TMDL's have been established.
Revised					
7.2.2	Existing BMP Performance Evaluation Program	GEMS Coordinator/Engineering	Evaluate existing BMP's and identify additional BMP's if necessary.	Evaluated existing BMP's, no changes or additions.	Evaluate existing BMP's and identify additional BMP's if necessary.
Revised					
7.3.3	Monitoring Regulatory Developments	GEMS Coordinator	Assess regulatory obligations at least 60 days prior to May 1 st Annual Report submission	Assessed regulatory requirements with EPA and MADEP	Contracted with a 3 rd Party Consultant to assist with filing the NOI and update Management Plans with new Stormwater Permit
Revised					
Revised					
Revised					

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

Part V. Program Outputs & Accomplishments (OPTIONAL)

(Since beginning of permit coverage unless specified otherwise by a **, which indicates response is for period covering April 1, 2017 through March 31, 2018)

Programmatic

	(Preferred Units)	Response
Stormwater management position created/staffed	(y/n)	No
Annual program budget/expenditures **	(\$)	\$7,500
Total program expenditures since beginning of permit coverage	(\$)	\$179,500 (est)
Funding mechanism(s) (General Fund, Enterprise, Utility, etc)		General Fund

Education, Involvement, and Training

Estimated number of property owners reached by education program(s)	(# or %)	1
Stormwater management committee established	(y/n)	No
Stream teams established or supported	(# or y/n)	No
Shoreline clean-up participation or quantity of shoreline miles cleaned **	(y/n or mi.)	No
Shoreline cleaned since beginning of permit coverage	(mi.)	No
Household Hazardous Waste Collection Days		
▪ days sponsored **	(#)	0
▪ community participation **	(# or %)	0
▪ material collected **	(tons or gal)	0
School curricula implemented	(y/n)	No

Legal/Regulatory

	In Place Prior to Phase II	Reviewing Existing Authorities	Drafted	Draft in Review	Adopted
Regulatory Mechanism Status (indicate with “X”)					
▪ Illicit Discharge Detection & Elimination					X
▪ Erosion & Sediment Control					X
▪ Post-Development Stormwater Management					X
Accompanying Regulation Status (indicate with “X”)					
▪ Illicit Discharge Detection & Elimination					X
▪ Erosion & Sediment Control					X
▪ Post-Development Stormwater Management					X

Mapping and Illicit Discharges

	(Preferred Units)	Response
Outfall mapping complete	(%)	100%
Estimated or actual number of outfalls	(#)	1
System-Wide mapping complete (complete storm sewer infrastructure)	(%)	100%
Mapping method(s)		
▪ Paper/Mylar	(%)	100%
▪ CADD	(%)	90%
▪ GIS	(%)	100%
Outfalls inspected/screened **	(# or %)	100%
Outfalls inspected/screened (Since beginning of permit coverage)	(# or %)	100%
Illicit discharges identified **	(#)	0
Illicit discharges identified (Since beginning of permit coverage)	(#)	0
Illicit connections removed **	(#); and (est. gpd)	0

Illicit connections removed (Since beginning of permit coverage)	(#); and (est. gpd)	0
% of population on sewer	(%)	100%
% of population on septic systems	(%)	0%

Construction

	(Preferred Units)	Response
Number of construction starts (>1-acre) **	(#)	0
Estimated percentage of construction starts adequately regulated for erosion and sediment control **	(%)	100%
Site inspections completed **	(# or %)	100%
Tickets/Stop work orders issued **	(# or %)	0
Fines collected **	(# and \$)	0
Complaints/concerns received from public **	(#)	0

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	100%
Site inspections (for proper BMP installation & operation) completed **	(# or %)	100%
BMP maintenance required through covenants, escrow, deed restrictions, etc.	(y/n)	No
Low-impact development (LID) practices permitted and encouraged	(y/n)	No

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets) **	(times/yr)	Once/year
Average frequency of catch basin cleaning (commercial/arterial or other critical streets) **	(times/yr)	1/year
Qty of structures cleaned **	(#)	103
Qty. of storm drain cleaned **	(%, LF or mi.)	75%

Qty. of screenings/debris removed from storm sewer infrastructure **	(lbs. or tons)	15 T
Disposal or use of screenings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Beneficial Use

Basin Cleaning Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	\$7500
• Hourly or per basin contract rate **	(\$/hr or \$ per basin)	\$97/Basin
• Disposal cost**	(\$)	\$0
Cleaning Equipment		
• Clam shell truck(s) owned/leased	(#)	0
• Vacuum truck(s) owned/leased	(#)	0
• Vacuum trucks specified in contracts	(y/n)	No
• % Structures cleaned with clam shells **	(%)	0
• % Structures cleaned with vector **	(%)	0

	(Preferred Units)	Response
Average frequency of street sweeping (non-commercial/non-arterial streets) **	(times/yr)	1
Average frequency of street sweeping (commercial/arterial or other critical streets) **	(times/yr)	0
Qty. of sand/debris collected by sweeping **	(lbs. or tons)	.5 T est.
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Beneficial use
Annual Sweeping Costs		
• Annual budget/expenditure (labor & equipment)**	(\$)	N/A
• Hourly or lane mile contract rate **	(\$/hr. or ln mi.)	N/A
• Disposal cost**	(\$)	N/A
Sweeping Equipment		
• Rotary brush street sweepers owned/leased	(#)	1
• Vacuum street sweepers owned/leased	(#)	1
• Vacuum street sweepers specified in contracts	(y/n)	No
• % Roads swept with rotary brush sweepers **	%	90%
• % Roads swept with vacuum sweepers **	%	10%

Reduction (since beginning of permit coverage) in application on public land of: ("N/A" = never used; "100%" = elimination)		
▪ Fertilizers	(lbs. or %)	0%
▪ Herbicides	(lbs. or %)	0%
▪ Pesticides	(lbs. or %)	0%
Integrated Pest Management (IPM) Practices Implemented	(y/n)	Yes

	(Preferred Units)	Response
Average Ratio of Anti-/De-Icing products used ** (also identify chemicals and ratios used in specific areas, e.g., water supply protection areas)	% NaCl % KCl % Urea	40 - 60% 46 - 60% 0.1 - 1.0%
Pre-wetting techniques utilized **	(y/n or %)	No
Manual control spreaders used **	(y/n or %)	50%
Zero-velocity spreaders used **	(y/n or %)	50%
Estimated net reduction or increase in typical year salt/chemical application rate	(±lbs/ln mi. or %)	0%
Estimated net reduction or increase in typical year sand application rate **	(±lbs/ln mi. or %)	0%
% of salt/chemical pile(s) covered in storage shed(s)	(%)	100%
Storage shed(s) in design or under construction	(y/n or #)	No
100% of salt/chemical pile(s) covered in storage shed(s) by May 2008	(y/n)	Yes

Water Supply Protection

Storm water outfalls to public water supplies eliminated or relocated	# or y/n	No
Installed or planned treatment BMPs for public drinking water supplies and their protection areas	# or y/n	No
Treatment units induce infiltration within 500-feet of a wellhead protection area	# or y/n	No