



DEPARTMENT OF VETERANS AFFAIRS  
VA CARIBBEAN HEALTHCARE SYSTEM  
10 Calle Casia  
San Juan, Puerto Rico 00921-3201

In Reply Refer To: 672/FMS

September 26, 2016

Mr. Sergio Bosques Nieves  
U.S. Environmental Protection Agency  
Multimedia Permits and Compliance Branch  
City View Plaza II, Suite 7000  
48 Road 165, Km 1.2  
Guaynabo, Puerto Rico, 00968-8069

2016 OCT -4 PM 1:02  
U.S. EPA  
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Dear Mr. Bosques-Nieves:

The VA Caribbean Healthcare System (VACHS) located in the municipality of San Juan, Puerto Rico is submitting the Notice of Intent (NOI) in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Permit for Regulated Small Municipal Separate Storm Sewer System (MS4). This is required by the US Environmental Protection Agency (USEPA) Region II, Clean Water Act (CWA). According to the 40 CFR 122.33, "all regulated small MS4s in the area of Puerto Rico must apply for NPDES permit coverage for their storm water discharges".

This document describes the facility and its operation, identifies potential pollution sources, and outlines best management practices (BMPs), to minimize the potential of pollutant discharges in the storm water runoff. Pursuant to this regulation, VACHS is submitting the following documentation to be in compliance with the requirements enforced by the U.S. Environmental Protection Agency, under the NPDES Program.

Should you have any questions regarding this matter, do not hesitate to contact the undersigned at your earliest convenience at (787) 641-7582 Ext. 10269 or via email [wilfredo.quinones-mendez@va.gov](mailto:wilfredo.quinones-mendez@va.gov).

Best regards,

A handwritten signature in black ink, reading "Wilfredo Quiñones-Méndez", is positioned above the typed name.

Eng. Wilfredo Quiñones-Méndez  
Chief, Facility Management Service  
VA Caribbean Healthcare System

Attachment:

1. NOI Application for MS4 General Permit

**United States Environmental Protection Agency**  
**National Pollutant Discharge Elimination System**  
Notice of Intent (NOI) for coverage under the Small Municipal Separate  
Storm Sewer System (MS4) General Permit (PRR040000) for Puerto Rico

**Part A. General Information**

1. Name of Municipality or Organization: Veterans Affairs Caribbean Healthcare System (VACHS)
2. Type: ☒ Federal ☐ State ☐ Municipality ☐ Other: \_\_\_\_\_
3. Existing Permittee: ☐ Yes ☒ No If yes, provide EPA NPDES Permit Number: N/A
4. Location Address:
  - a. Street: 10 Casia Street
  - b. City: San Juan State: PR Zip Code: 00921
5. Mailing Address:
  - a. Street: 10 Casia Street
  - b. City: San Juan State: PR Zip Code: 00921
6. Telephone Number: 787-641-7582 Fax: 787-641-9363
7. E-mail: carlos.cruz-gonzalez@va.gov
8. Standard Industrial Classification (SIC) Code (see instructions for common codes): 8062
9. Latitude: (use the format provided) Longitude: (use the format provided)  
*2.2.4.2 Approximate center of the regulated portion of the MS4.*  
18° 23' 21" N (degrees, minutes, seconds) 66° 04' 46" W (degrees, minutes, seconds)

**Part B. Primary MS4 Program Manager Contact Information**

1. Name: Eng. Carlos Cruz – González
2. Position Title: Chief, Environmental Regulatory Section and Operations Control Center
3. Stormwater Management Program (SWMP) Location (web address or physical location):  
Environmental Regulatory Section (ERS), Facility Management System (FMS),  
10 Casia Street, San Juan, PR 00921
4. Mailing Address:
  - a. Street: 10 Casia Street
  - b. City: San Juan State: PR Zip Code: 00921
5. Telephone Number: 787-641-7582 Ext. 10416
6. E-mail: carlos.cruz-gonzalez@va.gov

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**Part C. Eligibility Determination**

1. Endangered Species Act (ESA) determination completed? ☒ Yes ☐ No
  - a. Eligibility Criteria (check all that apply): ☒ A ☐ B ☐ C ☐ D ☐ E ☐ F
2. National Historic Preservation Act (NHPA) determination complete? ☒ Yes ☐ No
  - a. Eligibility Criteria (check all that apply): ☐ A ☒ B ☐ C ☐ D

**Part D. Map/Boundaries**

1. MS4/Organization description of regulated boundaries (narrative):

The VA Caribbean Healthcare System (VACHS) is federal medical complex, located on Casia Street in the Monacillo sector of the municipality of San Juan, Puerto Rico. The site is bounded by the north with the Medical Center, by the south with Road PR-21, by the east with the Psychiatric Hospital, and by the west with the Josefina's Creek and the Urban Train. The facility is located at the north region of the island at NAD 83 latitude 18° 23' 21" and longitude 66° 04' 46". It is located in a 25.8 acre with approximately 1,123,800 square feet. The MS4 serving VACHS has an area of approximately 0.43 square miles. EPA defines the municipality of San Juan as an urbanized area based on the 2010 US Census, belonging to the North portion water entities of Puerto Rico.

VACHS stormwater system consists of piping, sewers and manholes along the facility access roads. The system discharges to the Josefina Creek located to the west of the facility. The creek flows to the Río Piedras Watershed. The Río Piedras Watershed flows to the Martín Peña Canal, where it enters the San Juan Bay Estuary.

2. Location Map/Boundaries. A location map must be attached showing the pertinent city, town, wards, or boundaries, the boundaries of the Small MS4, including surface water body(s), and the "urbanized area" (UA) when applicable.

Is map attached? ☒ Yes ☐ No

For location maps/figures refer to Appendix A.

**Part E. MS4 Infrastructure (If covered under the 2006 general permit)**

Not Applicable – VACHS is a new permittee.

**Part F. Bylaw/Ordinance Development (If covered under the 2006 general permit)**

Not Applicable – VACHS is a new permittee.

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**Part G. Receiving Water**

List the names of all surface waterbody segments to which your MS4 discharges. For each waterbody segment, please report the number of outfalls discharging into it and, if applicable, any impairments. You may attach additional information.

| <b>Waterbody Segment that receives flow from the MS4</b> | <b>Number of outfalls into receiving waterbody segment</b> | <b>Have any monitoring been performed to outfalls? (Yes/No)</b> | <b>List of Pollutant(s) causing impairment (if applicable)</b> | <b>List of TMDL Pollutant(s) (if any)</b> |
|--|--|---|--|---|
| Josefina Creek   | Ten (10)   | No  | Not Available  | Not Available                             |

**Part H. Summary of Stormwater Management Program (SWMP) under the 2006 Small MS4 General Permit**

For every measurable goal and associated Best Management Practice (BMP) listed in the adopted program, provide the following information (You may include additional pages):

Not Applicable – VACHS is a new permittee.

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**Part I. 2016 Stormwater Management Program (SWMP) Summary**

**Public Education and Outreach**

(See Section 2.4.2 for detailed information of required BMPs):

| BMP Description or BMP ID (e.g. MCM-1)                       | Education Topic (Identify the issue your BMP is educating the public about).   | Outreach method (Describe the method used to convey this topic, e.g. mailing events, school, etc.)   | Measurable Goal (What is the end result of this program? What indicator will determine the goal has been met? [e.g., number mailing sent, people at event, class participation, etc.])  |
|--|--|--|---|
| <b>Implement an Stormwater Pollution Educational Program</b> | Public education and outreach activities will focus on general concepts of Stormwater Pollution Prevention & Water Quality; creating awareness of how stormwater pollution occurs in VACHS, how contaminants reach the nearest water body through stormwater runoff, the hazards associated with illegal discharges and what community can do to prevent this pollution. | Wide public involvement and participation program in the hospital, thru the general outreach activities.<br><br>Public participation meetings will be performed to obtain inputs from the VA Community.<br><br>Up-to-date Stormwater information on the VA Stormwater Webpage.   | Educate the public about stormwater issues in the community and the impact that it has on water quality.<br><br>Highlight stormwater issues through VACHS sponsored community events.<br><br>Number of employees and general public attending the activities. |
| <b>Distribute Educational Materials</b>                      | Educational materials will focus on concepts of Stormwater Pollution Prevention & Water Quality; on how stormwater pollution occurs in VACHS and how contaminants reach the nearest water body through stormwater runoff. Also additional information about illicit discharges will be distributed.  | Provide educational materials to all employees and general public. This education will be specifically intended to provide all staff with a basic understanding on how the stormwater pollution occurs in VACHS.<br><br>The program will include the preparation and distribution of written materials, including posters, brochures; bulletin boards announcements and newsletters to convey the message. | Provide printed articles in newsletters, brochures, posters, etc.<br><br>Total number of educational materials provided during the activity.<br><br>Provided educational materials in more than one language.   |
| <b>Storm Drain Stenciling Program</b>                        | This program educates the public about stormwater drain system and their link to surface water bodies.   | Stenciling storm drain inlets with a message warning employees, contractors, visitors and general public to not dump pollutants into the system.   | Prevent pollutant discharges into storm drain system.<br><br>Mark all stormwater drains with message.   |
| <b>Environmental Compliance Training Program</b>             | The training program will focus on all the requisites of the NPDES Small MS4 General Permit. For VACHS to be in compliance.  | Provide NPDES trainings to all employees on a yearly basis and to new employees during the new orientation period.<br><br>Educate employees on their role for compliance under the permit.   | Implementation of training program.<br><br>Number of employees trained.   |



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|   |  |   |   |
|---|--|---|---|
| <b>Stormwater Pollution Awareness Activities during Earth Day</b> | The activities will focus on creating awareness about stormwater pollution prevention and how to prevent and maintain water quality. | <p>VACHS will prepare a presentation on a yearly basis during the Earth Day's Activity to continue the awareness of the SWPP Program.</p> <p>Appropriate educational materials from various federal and state agencies such as, US EPA, PREQB, DRNA, ADS, and others, will be available to distribute to targeted audiences.</p> <p>A notice will be sent to all employees and general public about the activity and where they can find the educational materials.</p> | <p>Educate the public about stormwater issues in the community and the impact that it has on the water quality.</p> <p>Number of employees and general public attending the activity.</p> <p>Total number of educational material provided during the activity.</p> |
|---|--|---|---|

## Part I. 2016 Stormwater Management Program (SWMP) Summary

### Public Involvement and Participation

(See Section 2.4.3 for detailed information of required BMPs):

| <b>BMP Description or BMP ID (e.g. MCM-1)</b>        | <b>Program Description (Describe the program and how it will inspire public participation, e.g. special events, volunteer sampling and monitoring efforts, household hazardous waste recycling, etc.)</b>   | <b>Measurable Goal (What is the end result of this program? What indicator will determine the goal has been met? (e.g., participation, amount of sampling performed, waste collected, etc.)</b>  |
|--|---|--|
| <b>Develop a Public Involvement Plan</b>             | Develop a Public Involvement Plan that establishes how employees and general public can help prevent stormwater pollution in their work areas and VACHS.  | Successful implementation of the Public Involvement Plan.  |
| <b>Develop a Stormwater section on VACHS webpage</b> | Add a Stormwater Section to VACHS webpage, providing general information about the NPDES MS4 permit. Also it will have a section to report illicit discharges, request information. The webpage will also be used as a platform to broadcast events, providing online enrollments.                            | <p>Visibility to the stormwater management program.</p> <p>Number of downloads and requests for educational materials. Number of enrollment for activities.</p>  |
| <b>Storm Sewer System Map</b>                        | Develop a storm sewer system map showing the location of all outfalls, manholes, enumerated catch basins, and water bodies that receive discharges from the outfalls. The program will help keep stormwater drains free of debris, improving water quality and preventing pollutant from reaching the stream. | Map with all stormwater infrastructures marked within the MS4 area in VACHS.   |
| <b>Implement Cleanup Activities</b>                  | VACHS will request the sponsorship and cooperation of various entities to conduct a cleanup. The cleanup will require volunteers from the community and environmental groups to guide the activities and to identify the types of trash collected. The facility will coordinate the trash pickup.             | <p>Increase public awareness and understanding of stormwater issues within the hospital community.</p> <p>Number of tons of debris and recyclables collected during the cleanup events. Number of employees and general public attending the activities.</p> |
| <b>Volunteer Educators/Speakers</b>                  | Provide free workshops encouraging public participation during special events in VACHS.   | Educate employees and general public in VACHS community about stormwater and other environmental topics and issues around the island.  |

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**Part I. 2016 Stormwater Management Program (SWMP) Summary**

Illicit Discharge Detection and Elimination

(See Section 2.4.4 for detailed information of required BMPs):

| BMP Description or BMP ID (e.g. MCM-1)                                | Program Description (Describe the program and how it will identify and remove illicit connections from the MS4, e.g. new regulations, investigation, practices, removal of illicit connections, etc.)  | Measurable Goal (What is the end result of this program? What indicator will determine the goal has been met? (e.g., Adoption of bylaws/ordinances amount of investigation performed, identified and removed illicit connections, etc.)   |
|---|--|---|
| <b>Develop an Illicit Discharge Detection and Elimination Program</b> | Implement a program for the detection of possible illegal non-stormwater discharges into the system. The program will include visual assessments, connectivity testing, dye testing and/or smoke tests. Based upon the results of the analysis, a plan to address any identified illegal discharge will be prepared and included in the SWPP Plan.   | Inspect and document Illicit Discharge Determination in VACHS.<br><br>Develop procedures for program evaluation and assessment and implement procedures to prevent illicit connections and discharges.<br><br>Detect and address non-allowable non-stormwater discharges into the MS4 system. |
| <b>Illicit Discharge Detection and Elimination Education Program</b>  | The program will increase public awareness among employees and visitors about what is an illicit discharge.<br><br>It will help reduce and/or eliminate the frequency of illicit discharges into storm sewer system.   | VACHS will provide information about illicit discharges in the Stormwater webpage.<br><br>Prepare a post on how to alert and notify if discover an illicit discharge.   |
| <b>Maintain SPCC Plan updated</b>                                     | Maintain VACHS Spill Prevention, Control and Countermeasure (SPCC) Plan up-to-date, with all potential pollutant source information. The plan establishes the procedures, methods, equipment and other requirements to prevent the discharged of oil from non-transportation related onshore and offshore facilities into or upon the navigable waters of the United States or adjoining shorelines. | Full implementation and availability of SPCC.   |
| <b>Identification of Non Stormwater Discharges and Flows</b>          | Investigate and evaluate potential for non-stormwater discharges to be significant contributors of pollutants. For those non-stormwater discharges or flows identified as significant contributors of pollutants to our MS4, develop an action plan to eliminate then that impact the stormwater quality.  | Develop a process to evaluate non-stormwater discharges to VACHS MS4.<br><br>Total number of investigations and evaluations performed.  |
| <b>Implement a MS4 Outfalls Inspection Program</b>                    | Perform monthly inspection to all MS4 outfalls to ensure acceptable conditions.  | Complete all monthly inspections and perform any needed corrective action.  |
| <b>Used Oil Recycling Program</b>                                     | VACHS will update the used cooking oil recycling program. Assuring all used oil is recycled and properly handled.  | Number of gallons of used cooking oil recycled in a year.   |

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**Part I. 2016 Stormwater Management Program (SWMP) Summary**

Construction Site Stormwater Runoff Control

(See Section 2.4.5 for detailed information of required BMPs):

| BMP Description or BMP ID (e.g. MCM-1)  | Program Description (Describe the program and how it will help control Stormwater runoff at construction sites, e.g. new regulations, construction practices, inspection protocols, etc.)  | Measurable Goal (What is the end result of this program? What indicator will determine the goal has been met? (e.g., Adoption of bylaws/ordinances amount of investigation performed and sites actively regulated, etc.) |
|---|--|--|
| <b>Construction Site Implementation of Erosion and Sediment Control Program</b>     | Develop, implement and enforce a program to reduce pollutants in any stormwater runoff to their MS4 from construction activities. For construction activities covering one acre or more of land or covering less than one acre that are part of a larger common plan, VACHS will require that the construction activity be implemented in to the NPDES General Permit for Storm Water Discharges from Construction Activities issued by the EPA in July 1, 2003. For any construction project with an area greater than 900 meters, a Plan CES will be requested in order to obtain a Permit CES from the EQB. By implementing the requirement of meeting the conditions of the Construction Activities General Permit the VACHS will assure that adequate erosion and sedimentation controls are implemented and inspected during the project construction phase. | Establish requirements for construction waste control that may cause adverse impact to stormwater quality.<br><br>Complete plan review process and documentation procedures.<br><br>Conduct annual program assessment.   |
| <b>Establish Procedures for Site Inspections and Enforcement of Control Measure</b> | VACHS will specify the procedures for construction site best management practice (BMPs) inspections and the enforcement of installed erosion and sedimentation control measures. This program shall also address contractor and inspector training and certification.  | Procedures for construction site BMP inspections developed and implemented.<br><br>Gather feedback from inspectors.  |
| <b>Develop a Construction Site Plan Review Program</b>                              | VACHS will develop a Construction Site Plan Review Program, which will establish procedures for construction projects that consider potential water quality impacts.   | Develop and implement the Construction Site Plan Review Program  |
| <b>Develop SOPs for constructions projects</b>                                      | VACHS propose the development of a Construction SOP aimed to provide developers guidance to address regulation requirement.  | Number of projects in compliance with local and federal requirements.  |
| <b>Provide training to contactors</b>   | Provide stormwater runoff trainings to contractors working in VACHS.   | Educate all contractors at VACHS.  |
| <b>Develop a Construction Site Inventory</b>  | VACHS will maintain an inventory of all permitted construction site projects that result in a total land disturbance of one or more acres.   | Have the inventory available at any moment to permitting authority.  |



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**Part I. 2016 Stormwater Management Program (SWMP) Summary**

Post-Construction Stormwater Management in New Development and Redevelopment

(See Section 2.4.6 for detailed information of required BMPs):

| <b>BMP Description or BMP ID (e.g. MCM-1)</b>  | <b>Program Description (Describe the program and how it will help control Stormwater runoff from properties after they are developed, e.g. new regulations, practices, or resources for contractors to use Low Impact Development (LID), etc.)</b>   | <b>Measurable Goal (What is the end result of this program? What indicator will determine the goal has been met? (e.g., Adoption of bylaws/ordinances amount of implemented practices, development of capacity building resources, etc.)</b>  |
|--|--|---|
| <b>Development and Implementation of Structural and/or Non-structural BMPs Program</b> | VACHS is planning to develop a post construction runoff control management program for areas within the facility that will undergo new development or re-development. The program would be aimed to reducing pollutants in post-construction runoff from these areas, controlling stormwater discharges. | Require the implementation of post-construction runoff control measures in the constructions projects through FMS Project and Planning Section.<br><br>Ensure inspections and maintenance of the control measures is performed.<br><br>Inspect stormwater runoff pollution control during post construction activities. |
| <b>Inspection of All Structural Pollution Control Devices</b>                          | VACHS will make a program that deals with inspection and cleaning of all outfalls and catch basins in the storm sewer system.<br><br>Also the program will ensure that all measures are operating correctly and are being maintained.  | Implement a catch basin and outfalls cleaning schedule<br><br>Inspect, maintain, and document inspection findings in a report, this must be available to permitting agency.<br><br>Total number of catch basins cleaned and inspected   |
| <b>Development of SOPs for post-constructions projects</b>                             | VACHS propose the development of a Post-Construction SOP aimed to provide developers guidance to address regulation requirement.   | Number of projects certified in compliance with local and federal agencies.   |
| <b>Project Operators Program</b>   | The permittees must design, implement and maintain structural and non-structural BMPs.   | Protect water quality.  |

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**Part I. 2016 Stormwater Management Program (SWMP) Summary**

Good Housekeeping and Pollution Prevention in Municipal Operations

(See Section 2.4.7 for detailed information of required BMPs):

| <b>BMP Description or BMP ID (e.g. MCM-1)</b>  | <b>Program Description (Describe the program and how it will mitigate Stormwater runoff at municipal properties or through municipal activities, e.g. installation of structural Stormwater controls on the municipal properties, new practices to reduce pollutant exposure to rain events, runoff management, trainings, etc.)</b>   | <b>Measurable Goal (What is the end result of this program? What indicator will determine the goal has been met? (e.g., structural BMPs installed, SOPs developed and implemented, etc.)</b>       |
|--|--|--|
| <b>Pollution Prevention and Good Housekeeping Education Program</b>                                    | <p>The Pollution Prevention and Good Housekeeping Education Program will increase the public awareness about good housekeeping practices for pollution prevention.</p> <p>VACHS will continuously improve the housekeeping program that will reduce or eliminate the impacts of storm water pollution from impervious surfaces, building maintenance and garbage disposal.</p> | <p>Prevent and/or reduce pollutants from entering the MS4 system.</p> <p>Fully develop procedures for the regular inspection and cleaning of its storm sewer and roadway system.</p>               |
| <b>Develop an Inspection and Maintenance Schedule</b>  | Develop a scheduled for all maintenance activities and inspections required to maintain the System in adequate conditions and in compliance with local agencies. Also inspect and provide maintenance to all the stormwater potential pollutant sources in the facility.   | Provide periodical maintenance and inspections to the ms4 system and PPS, minimizing pollutant discharges to stormwater.   |
| <b>Provide trainings on how to incorporate pollution prevention &amp; good housekeeping techniques</b> | Provide trainings and educational materials to personnel who will be in involved in the operation and maintenance of the MS4 system. Training material used will be prepared by VACHS or already available by EPA, PREQB or other entities.  | <p>Implement the program and educate employees about pollution prevention and good housekeeping techniques in order to prevent stormwater pollution.</p> <p>Total number of employees trained.</p> |
| <b>Good Housekeeping and Pollution Prevention Program Information Center</b>                           | VACHS will have goals, examples, and good housekeeping practices listed on their stormwater webpage. Also VACHS will develop a quarterly giving an example of good housekeeping practices.   | Publishment of article in VA Stormwater webpage.   |
| <b>Implement Structural Controls</b>   | Install structural controls to catch basins to capture and prevent pollutants from entering the system.  | Reduce or eliminate the discharge of pollutant by implementing structural BMPs.  |

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**Part J. Application Certification and Signature**

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 gathered and evaluated 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 of Mayor/Elected Official: Wilfredo Quiñones-Méndez

Print Name of Mayor/Elected Official: Eng. Wilfredo Quiñones-Méndez

Title: Chief, Facility Management Service (FMS) Date: 9/30/16

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**Appendix A – MS4 Location Maps**





Prepared by: Solanch S. Pastrana

Approved by: Geidy García



**Veterans Affairs  
Caribbean Healthcare System  
Casia Street #10, San Juan Puerto Rico**







**Topographic Map**

**Prepared by: Solanch S. Pastrana**

**Approved by: Geidy García**

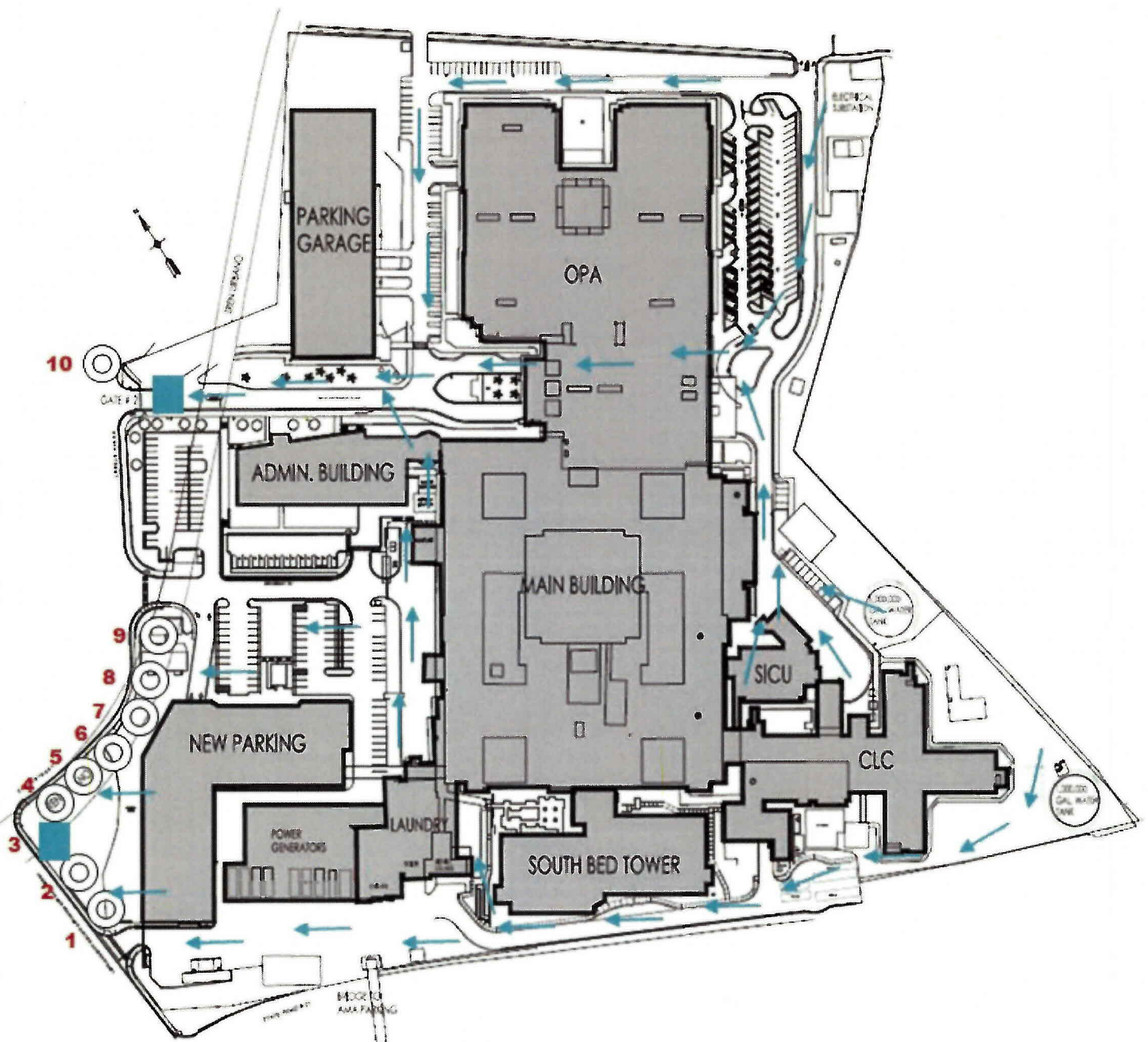
**Scale: 1:20,000**



**Veterans Affairs  
Caribbean Healthcare System  
Casia Street #10, San Juan Puerto Rico**







## Stormwater Flow

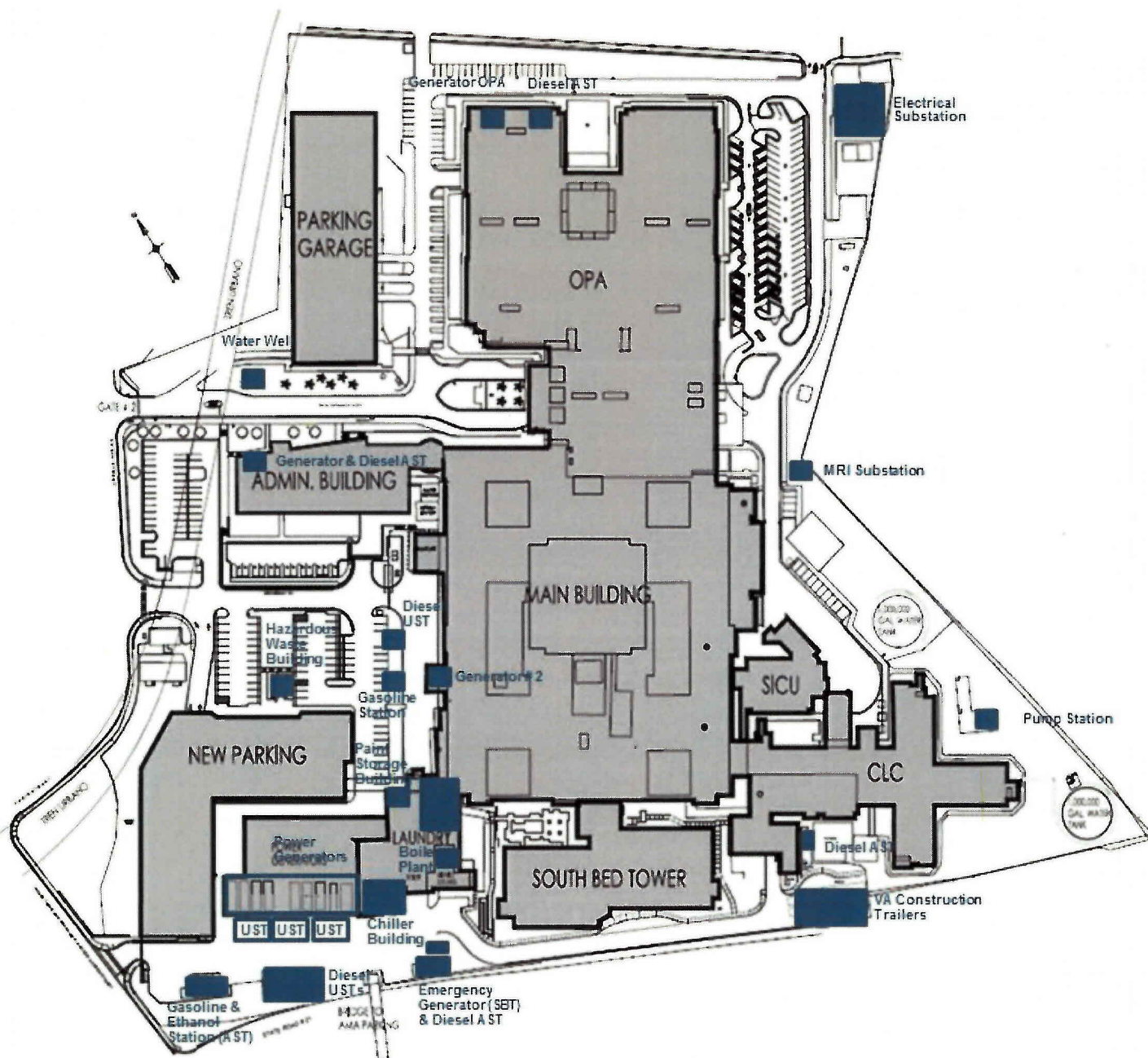


Prepared by: Solanch S. Pastrana

Approved by: Geidy García

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## Stormwater Potential Pollution Sources



Prepared by: Solanch S. Pastrana

Approved by: Geidy García

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