

U.S. Department of
Homeland Security

United States
Coast Guard



Commanding Officer
United States Coast Guard
Air Station Cape Cod

Building 3163
Air Station Cape Cod, MA 02542
Staff Symbol: PRU
Phone: (508)968-6308
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MAY 5 2009

1100
May 1, 2009

U.S. EPA Region 01
1 Congress Street, Suite 1100
(CMU)
ATTN. Ms. Murphy
Boston, MA 02114-2023

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Dear Ms Murphy:

Attached as enclosure (1), please find our 2008 Storm Water Phase II Annual Report.

Should you have any questions please contact me at (508) 968-6487.

Sincerely,

A handwritten signature in black ink, appearing to read "R.F. Cannon Jr.", written over a horizontal line.

R.F.CANNON JR
Environmental Health and Safety Manager
By direction of the Commanding Officer

Encl: (1) 2008 Storm Water Phase II Annual Report

PART I GENERAL INFORMATION

Name of Permittee: United States Coast Guard, Air Station Cape Cod

Mailing Address: United States Coast Guard
Air Station Cape Cod
Environmental Health & Safety
Building 5216
Bourne, MA 02542

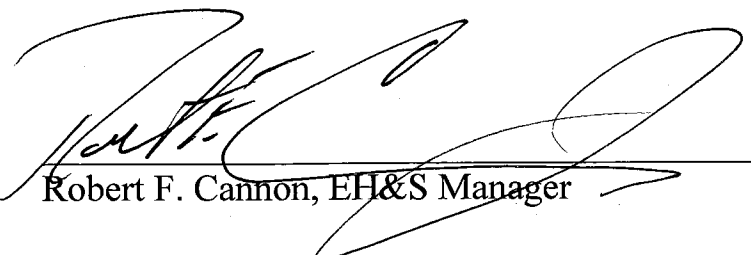
Contact Person: Robert F. Cannon, Environmental Health & Safety Manager

Telephone No.: 508-968-6487 email: Robert.f.cannon@uscg.mil

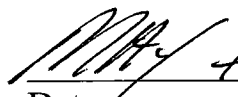
Reporting Period: May 1, 2008 – April 30, 2009

Certification

I certify under penalty of law that this document and all its attachments were prepared under a system designed to assure that qualified personnel properly gather and evaluate the information submitted to manage the system, or those persons directly responsible for gathering information, I certify, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties, including the possibility of fine and imprisonment for knowing violations.



Robert F. Cannon, EH&S Manager



Date

PART II ANNUAL REPORT

BMP/ID RESPONSIBLE PARTY	MEASURABLE GOAL	STATUS	CHANGES/GOALS FOR NEXT REPORTING YEAR
<p>1) Public Education & Outreach</p>	<p>Develop: a. Educational pamphlet / fact sheet for distribution to all 5 commands w/ jurisdiction of the MMR, CG Housing residents, CG members, the schools, and during appropriate events such as HHW collection days; b. Information pertaining to water pollution / protection to be included in the Welcome Aboard Package; c. A Power Point Presentation to be aired on the Stations public tv channel 3 (to include a hotline number for obtaining additional information and/or reporting suspicious / illegal dumping activity.</p>	<p>a. Developed informational pamphlets, and distributed over 1,000 via mass mailing to residents at military housing. b. Pamphlets provided to "Housing" to include in the Welcome aboard package and provided to new residents moving into housing. c. New reporting personnel to be provided a summary and pamphlet when they complete their check-in process (per EMS procedure 18)</p>	<p>a. No change; ensure distribution to other MMR commands, Schools and during HHW events. b. No Change c. No Change</p>

BMP/ID RESPONSIBLE PARTY

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<p>2) Public Involvement / Participation</p>	<p>a. Environmental Quality Committee, which has representatives from all 5 military commands with jurisdiction over the entire MMR, will add to the meeting agenda (as appropriate) storm water pollution prevention initiatives, share SWPPP information and support each other in the implementation of the plan.</p>	<p>a. EH&S Dept / Bob Cannon to bring the endeavor to the forum. On NOV18, 2007 the Committee discussed crossed boundaries and storm-water pollution issues. b. Reduce litter and other solids from entering storm drains and water ways. Measurable goal: Coordinate efforts with general public and other volunteer committees to clean up public lands of debris around sensitive watersheds, such as the recent clean-up on Earth day, possibility of Adopt a Stream/Pond program.</p>	<p>a. Continue to keep the topic of water quality issues and storm-water pollution prevention on the Committee's agenda. b. No Change</p>
<p>3) Illicit Discharge Detection and Elimination</p>	<p>a) Develop Storm drain map b) Develop Station Instruction prohibiting illicit discharge into storm drain. c) Plan to detect and address non-storm-water discharges.</p>	<p>a) Storm drain map U7034A01 developed. Map details all outfalls, names of waters receiving discharge, all catch basin locations and pipes within systems. Latest revision 1/30/03. b) Draft Procedure for EMS completed 04/2008. c) There is no concern for illicit discharge as no unauthorized connections can be made due to the nature of this federal facility. Nonetheless, routine inspections of outfalls will be established. EMS Procedure 27 details procedures for inspecting outfalls created July '03.</p>	<p>a) Updated as needed. b) Revise as needed. c) Maintain inspection procedures and updated as needed</p>

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STATUS

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4) Construction site Storm Water Runoff Control			
	<p>Pre-construction meetings to be held between Facility Engineering, contractors, COTR (Contracting Officer Technical Rep), Contractors and the EH&S Dept</p>	<p>Informally pre-construction meetings are being held. Recognize the benefits to developing a meeting checklist to formalize the meetings and ensure all appropriate and necessary topics are addressed. At a minimum, meeting is to address:</p> <ul style="list-style-type: none"> ➤ Fire safety; ➤ OSHA issues; ➤ Environmental issues, Clean Air Act, Clean Water Act, waste disposal, hazardous waste issues, special waste, universal waste, covering the basis of a NEPA review, sediment and erosion control; ➤ Security requirements; ➤ Immediate action to be taken when out of compliance. 	<p>Consider adding this procedure to the EMS. Review the NOI contractors submit to State/Federal Authorities and tailor it to ASCC needs.) Target date July 2009</p>

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<p>5) Post-Construction Storm Water Management in New Development and Re-development</p>	<p>Develop a process to identify post construction run-off to prevent/minimize impacts to water quality.</p>	<p>Restoration of property is part of the contract, i.e. erosion control. The CG assigns a "COTR" officer to all construction projects. The COTR will <i>not</i> sign off on completion of the project (and payment is withheld) unless restoration of property has occurred. This is part of the COTR job requirements.</p>	<p>On-going effort.</p>

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<p>6) Pollution Prevention / Good Housekeeping for Municipal Operations</p>	<p>a. Develop Procedures in the Environmental Management System (EMS) to address good house keeping requirements.</p>	<p>a. Thorough review of EMS completed Feb 2005. Identified BMP that may be formally/informally incorporated in EMS. b. Create Procedures based on EMS review and identified shortfalls c. Employee training: yearly training will be required of all appropriate personnel to provide them updates of any BMPs and new requirements of them while performing their jobs. d. Create a list of identified critical basins for regular cleaning and clean every basin within a 2 year cycle e. All City streets swept at a minimum 1X per year. Sweeping begins after the last snow/frost and continues until completion. f. Continue to coordinate with the Upper Cape Cod Communities to hold household hazardous waste collection events. Over 50 tons of hazwaste diverted from polluting bodies of water. g. Annual maintenance on salt/sanders performed to ensure proper function and truck drivers set the dispersing rate to ensure appropriate amounts of salt/sand spread and minimize dumping of loads.</p>	<p>a. No Change b. No Change c. No Change. d. No Change e. No Change f. No Change g. No Change</p>

PART III SUMMARY / MEASURE OF SUCCESS

Prior to the Storm-water Phase II regulatory requirements, the US Coast Guard Air Station Cape Cod took (and continues to take) environmental and water quality issues very seriously. The Station is self-certified ISO 14001 and has effectively implemented its Environmental Management System (EMS). Compliance with the new storm-water pollution prevention regulatory requirements was folded into the Station's EMS and incorporated many of the best management practices required by the regulation. This enabled the Station to streamline its operations in accord with compliance issues, avoid redundancies and ensure appropriate efforts were being made to achieve the goals set.

Employee training on the regulations and practical application of compliance with regard to day-to-day activities is being conducted. This training ranges from creating new operational requirements and providing instructions to appropriate personnel, to training for all personnel about general awareness of water quality issues. Public education and outreach programs are also being developed. In order to increase public awareness, maximum utilization of volunteer organizations is being made to get the word. The theory is to weave water quality topics into the general public's daily activities, thereby influencing their habits and changing any bad habits that created water pollution.

Mapping of the storm-water drainage system is complete. Unlike municipalities, this federal facility has complete control of its system, therefore no unauthorized connections can be made and illicit discharges are virtually eliminated. Nonetheless, the Station recognizes the fallibility of any human system and best management practices have been put in place to routinely inspect the outfalls. To date no illicit discharges have been detected.

Air Station Cape Cod continues to focus on meeting the goals set for the next reporting period, devoting 2 office personnel to spearhead the public education and outreach projects. Also, efforts at implementing a more formal pre and post-construction Station Instructions and Procedures are being made. Further, the Air Station will again coordinate with 4 participating communities on the Cape for Household Hazardous Waste Collection events during the summer of 2008.