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NPDES PII Small MS4 General Permit
2010 Annual Report

Municipality/Organization: ENRM VA Hospital
EPA NPDES Permit Number: BRP WM 08A
Mass DEP Transmittal Number: W- 040896
Annual Reporting Year: 2010

General Information

Contact Person: Lili Griffin Title: Environmental Management System Coordinator
Telephone #: 781-687-2222 Email: lili.griffin@va.gov
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: 
Printed Name: Tammy A. Follensbee
Title: Director
Date: 04/30/10

Public Education

BMP #1- Research basic Hospital practices that are likely to negatively impact storm water. Research land uses susceptible for releasing pollutants, maintenance practices or lack thereof, and any other Hospital activity that has an impact on storm water loadings.

Goal: Status Report on Hospital Practices

Comment: The use of herbicides on the main campus is prohibited at this time. Routine hospital practices are not expected to negatively impact storm water as long as Standard Operating Procedures are used for underground storage tank maintenance and oil deliveries. Construction projects could impact storm water and are reviewed on a case by case basis.

BMP #2- Distribute Fact Sheet on storm water (available from EPA or Massachusetts DEP).

Goal: 300 Fact Sheets distributed to Hospital employees.

Comment: This was accomplished in 2003.

BMP #3- Research, write and distribute flyer targeting the Hospital's highest priority storm water problem.

Goal: Distribute flyer to all impacted employees.

Comment: 2003 review of facility operations concluded that there were nothing unusual that the EPA/Mass DEP Fact sheets didn't cover. A second flyer was therefore not distributed.

BMP #4- Develop "Clean the Hospital Grounds Day"

Goal: Schedule and Conduct "Clean the Hospital Grounds Day"

Comment: Because of the excellent ongoing grounds/maintenance services provided by our Engineering service, the development of a special grounds cleaning day was found to be unnecessary.

BMP #5- Research, write, and distribute flyer targeting the Hospital's 2nd highest priority storm water problem

Goal: Distribute flyer to all impacted employees.

Comment: As per BMP 3#, this was determined to be not applicable.

BMP #6- Plan a public meeting to discuss programs, issues, existing and future plans impacting the Hospital employees and the public.

Goal: Conduct the Public Meeting

Comment: A meeting was conducted with a large number of staff in 2004 (Facility Management employees). The MS4 program was discussed. Hospital activities at that time were not determined to have a significant impact on storm water. The possibility of unexpected spills from leaking equipment contaminating storm drains was discussed. Engineering Service maintains spill equipment to be used in such an event.

Public Involvement/Participation

BMP #7- Interview Hospital employees involving their concerns relating to storm water and water quality issues.

Goal: Produce report on employee views after conducting a minimum of 50 interviews.

Comment: A Storm-water Questionnaire was distributed in 2004. No issues were raised by employees as a result of that questionnaire.

BMP #8 – Based upon employee and any public citizen concerns identified in BMPs 1-7, form a volunteer Task Force to help address specific concerns on storm water/water quality enumerated.

Goal: Organize and establish the Hospital Volunteer Task Force on storm water.

Comment: As employee concerns were not identified in the above, the creation of a Task Force was not applicable.

BMP #9- Organize through the volunteer Task Force a Public Meeting to provide a forum for identifying any additional storm water/water quality issues as expressed by the public.

Goal: Hold at least one Task Force public meeting.

Comment: A task force was not found to be applicable at this facility. Employees in the meeting held as per BMP #5 were asked to bring any future issues to the attention of the facility Industrial Hygienist.

BMP #10- Develop a plan of action through Task Force input to address public concerns regarding storm water.

Goal: Carry out at least 2 clean up efforts or public awareness projects from the "plan of action" per BMP #10.

Comment: Determined not to be applicable.

BMP #11- Assess progress and future steps, if necessary for storm water/water quality improvement.

Goal: Conduct a minimum of 2 Task Force meetings to address progress and next steps.

Comment: Determined not to be applicable.

Illicit Discharge Detection & Elimination

BMP #12- Conduct dry weather flow evaluations (e.g. are they present?)

Goal: Issue report on results of dry weather flow survey.

Comment: Dry weather storm sewer survey was conducted by Web Engineering 2005-2006. There did not appear to be any illegal inflows to pipes discharging to the ground or local waterways surrounding the Hospital. The report is on file in the Safety Office.

BMP #13- Verify existing outfall map as accurate.

Goal: If necessary, produce an updated accurate outfall map

Comment: Storm water drawing for the property has been updated.

BMP #14- Verify any Federal or specific Hospital regulations that deal with discharges and enforcement capabilities.

Goal: Issue letter report on findings regarding existing enforcement capabilities.

Comment: Document search found no VA or Hospital specific regulations applicable to storm water discharges.

BMP #15- Conduct dye testing to determine sources of illicit discharges (if present).

Goal: Conduct at least 5 dye testing efforts or water quality sampling efforts to help identify potential illicit discharges.

Comment: In 2006 Web Engineering took water samples at five locations. An additional sample was taken from the stream that drains the golf course east of the hospital buildings. The results of the sampling program indicated that hydrocarbon runoff from parking lots along with total suspended solids were having little or no impact downstream. Total coliform counts ranged from 700 to 35,000 colonies per 100 milliliters. The highest counts were at a location that drains Avenues D & E and parking lots 2 and 2A. The results of this sampling are on file in the Safety Office. Possible causes considered

Goal: Produce document identifying up to 10 new actions or contractor options to help maintain storm water on site rather than discharge into the sewer system.

Comment: Storm water plans are produced by our consultants as needed and reviewed by the Town of Bedford as needed.

BMP #21 - Review the Hospital Master Plan for long term maintenance of buffer zones along tributaries and open space.

Goal: Modify the Master Plan where necessary to preserve buffer zones or add zones to lower erosion and sedimentation and improve water quality levels for turbidity and bacteria in Spring Brook.

Comment: A wetlands delineation was completed and buffer zones were identified and will improve water quality to Spring Brook Creek.

BMP #22- Conduct a catch basin sampling program for the most urbanized areas of the Hospital and identify top three pollutants.

Goal: Develop and implement up to 5 structural or non-structural controls to lower pollutant levels in receiving waters.

Comment: 2006 sampling did not identify chemical pollutants. However this BMP will be reconsidered as part of future Storm Water Plan.

Pollution Prevention/Good Housekeeping

BMP #23- Assess and define potential housekeeping/pollution prevention needs. Examine: street/parking lot sweeping procedures, flood control, vehicle maintenance areas, waste disposal, recycling, and sewer maintenance.

Goal: Produce report on highest priority problem areas impacting storm water.

Comment: Report not produced. Will be considered for future Storm Water Plan

BMP #24- Develop Operation and Maintenance Program for identified housekeeping needs

Goal: Produce an Operations and Maintenance Manual with schedules for good housekeeping, pollution prevention, and corresponding procedures to follow.

Comment: Report not produced. Will be considered for future Storm Water Plan

BMP #25- Develop a Hospital personnel training program for identified problem areas.

Goal: Train all appropriate Hospital employees impacted by O & M modifications

Comment: Training is conducted for persons dealing with oil storage tanks and deliveries.

BMPs for TMDL (pathogens contributing to the Shawsheen River)

BMP #26- Sample key urban catch basins for coliform as well as outfalls at the Golf Course to determine if the Hospital is a contributor to the pathogen loadings of the River Basin.

Goal: Sample up to 10 points for coliform to determine if this pollutant is of concern regarding the Hospital.

Comment: See comments for BMP #15 above. Pollutants of concern have been identified by MA DEP for the Spring Brook (pathogens). We are in contact with the City of Bedford to assess our regulatory obligations at least 60 days prior to the May 1 annual report submission. There are no obligations at this time.