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NPDES PII Small MS4 General Permit  
2010 Annual Report

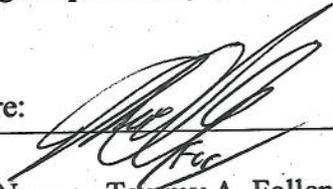
Municipality/Organization: ENRM VA Hospital  
EPA NPDES Permit Number: BRP WM 08A  
Mass DEP Transmittal Number: W- 040896  
Annual Reporting Year: 2010

**General Information**

Contact Person: Lili Griffin Title: Environmental Management System Coordinator  
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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:   
Printed Name: Tammy A. Follensbee  
Title: Director  
Date: April 30, 2011

## Goal 1: Public Education and Outreach

- Annual mandatory environmental training (i.e., GEMS) now includes as part of the training awareness to employees to report to the Safety Office any hospital activities that could impact the Shawsheen watershed (i.e, oil changes by employees in parking lots, leaks from vehicles, etc).
- Funding was received in 2010 for hands-On 29 CFR 1910.120, "Hazardous Waste Operations and Emergency Response" training to train workers how to contain and prevent hazardous materials from entering storm systems. Training scheduled in May 2011.
- Existing Standard Operating Procedures for delivery of fuel oil were reviewed and revised to improve communication in case of spills and to ensure appropriate notification triggers.
- Construction projects which could impact storm water were reviewed on a case by case basis by the environmental engineer.
- The new Asst. Chief of Engineering was provided training on Massachusetts-specific storm water triggers for construction projects.
- We have completed 26 Best Management Practices which are described in previous annual reports. We continue to focus with new I/I studies to ensure our operations are not adversely affecting surrounding surrounding communities or create public health issues.

## Goal 2: Public Participation/Involvement

- We joined the Shawsheen Watershed Association so that we could become more aware of activities in the watershed and updates on water quality issues.
- Any complaints from members of the public with regard to water quality issues or concerns would be provided to our Public Affairs officer. No complaints were received in 2010.

## Goal 3: Illicit Discharge Detection and Elimination

- Our facility has received funding for a sewer line inflow/infiltration study in 2010. Once this study is completed our engineering service will know how to allocate funds to replace systems which need maintenance. The existing system is a separate system. If any cross-connections exist or repairs are needed, they will be identified as part of this study.

#### Goal 4: Construction Site Runoff Control

- In 2010, we worked with the Town of Bedford to get all necessary permits for construction for replacement of underground storage tanks that were within wetlands/river way buffers. The amount of fuel stored has been reduced significantly due to conversions to natural gas as primary fuel for the boiler plant. A sedimentation and runoff control plan was prepared and coordinated with the Town of Bedford. No increases in storm water runoff were associated with the tank project.
- All construction sites are carefully monitored by project engineers to assure that the contractor meets the requirements for storm water and sediment and erosion control and does not create any water quality issues from our activities.

#### Goal 5: Post Construction Runoff Control

- Construction is primarily interior renovation. A greenhouse was removed though and will reduce our storm water footprint. We are seeking funds to remove structures that are no longer needed (i.e, chicken coops). No increases in storm water runoff were associated with construction projects. No major construction is underway or planned at this time.

#### Goal 6: Pollution Prevention/Good Housekeeping

- The facility completed annual storm drainage/catch basin maintenance this year.
- Groundskeepers maintain clean grounds free of debris and trash. Good housekeeping is monitored by the environmental engineer and inspection teams who inspect each and every building throughout the year as part of hospital accreditation (i.e., Environment of Care).
- We have a procurement technician who maintains a chemical inventory system and who is working to substitute green products across the hospital.
- Reuse is part of the waste collection program when products are found which can be used by other services as much as possible.
- Our recycling facility and contract with Conigliaro, Inc. who recycles more than what is required by Mass. Waste Ban rules ensures that a maximum amount of recycling occurs and very little of our waste goes to landfills.

## Goal 7: Controlling Pollutants of Concern

- Our facility primarily drains to an unnamed creek which then drains to Spring Brook. Report MA83-01-2002-24, titled "Bacteria TMDL for the Shawsheen River Basin" did find exceedances within the Spring Brook tributary but the source of the contamination was not found. Our funding of a new I/I study as previously discussed will identify any illicit discharges or interconnection issues.
- We are in contact with environmental consultants who are monitoring any changes to the MS4 programs as they apply to us. At this time, we are continuing our goals of our existing permit until revised regulations are finalized.
- The use of commercial grade vinegar was purchased by grounds personnel and is working well to kill nuisance weeds (poison ivy, etc).
- Integrated Pest Management training was provided to all grounds personnel to increase awareness of the toxicity of herbicides.