

**Municipality/Organization:** Division of Capital Asset Management & Maintenance (DCAMM)

---

**EPA NPDES Permit Number:** MAR043018

---

**MassDEP Transmittal Number:** W-036168 Grafton Complex, W-035906 Lancaster Complex, W-035612 Glavin Regional Center

---

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

---

## NPDES PII Small MS4 General Permit Annual Report

### Part I. General Information

**Contact Person:** Lori Anderson **Title:** Environmental Analyst III

---

**Telephone #:** (617) 727-4050 **Email:** lori.anderson@state.ma.us

---

**Mailing Address:** DCAMM, One Ashburton Place, Boston MA 02108

---

#### 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:**  Jeffrey Dill, Director of Property Operations

---

**Date:** 5/15/2018

---

## **Part II. Self-Assessment**

### **IIA. OVERVIEW AND BACKGROUND**

Division of Capital Asset Management & Maintenance (DCAMM) is responsible for capital planning, public building construction, facilities management, and real estate services for the Commonwealth of Massachusetts (the Agency). The Agency manages several occupied and unoccupied properties throughout the State. DCAMM properties located within urbanized areas with a point source discharging to waters of the United States are subject to the requirements of the United States Environmental Protection Agency (USEPA) General Permits for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) in Massachusetts effective on May 1, 2003 (2003 Small MS4 Permit). The 2003 Small MS4 Permit expired on May 1, 2008; however, the 2003 Small MS4 Permit remains in effect for authorized Operators until a new Small MS4 Permit is issued by the USEPA. DCAMM's Office of Facilities Management and Maintenance (OFMM), Operations & Technical Services, located in Boston, Massachusetts, oversees the implementation of the Small MS4 Permit at applicable DCAMM properties.

DCAMM has historically completed the required self-assessment annually for the 2003 Small MS4 Permit cycle for the determination of compliance with the permit conditions.

### **IIB. PERMIT HISTORY**

DCAMM originally filed Notice of Intents (NOIs) for coverage under the 2003 Small MS4 Permit for several properties located in regulated urbanized areas. During the 2003 Small MS4 Permit cycle, the ownership and management responsibilities for the small MS4 permitted properties have changed. DCAMM has also gained responsibilities for additional properties subject to National Pollutant Discharge Elimination System (NPDES) MS4 permitting; however, the expiration of the 2003 Small MS4 Permit did not allow for the Agency to file a NOI for coverage under the general permit. Historically, an annual review of new OFMM properties assigned to DCAMM's control is completed for evaluating the application of the permit to newly acquired facilities. If a facility is determined to be within a regulated urbanized area, DCAMM has included the regulated properties in the annual report and adopted stormwater programs, which comply with the conditions of the 2003 Small MS4 Permit. For those facilities which are sold, or ownership is transferred to another entity, DCAMM has filed a Notice of Termination (NOT) or provided permit termination information in the filed annual report.

DCAMM committed to incorporating new facilities into the established stormwater program for implementing Best Management Practices (BMPs) until the issuance of a new Small MS4 Permit. A list of the applicable DCAMM regulated properties is provided in Table 1.

**TABLE 1 – SMALL MS4 REGULATED DCAMM FACILITIES**

FACILITY	TOWN	OWNERSHIP STATUS	PERMIT STATUS
Grafton Complex	North Grafton	Tenant occupied, with closed unoccupied buildings operated by DCAMM	<b>Active</b> NOI filed July 28, 2003 USEPA: MAR043017 MassDEP: W036168
Grafton Department of Youth Services	Middleton	Tenant occupied facility, with active DCAMM management.	<b>Active</b> – added to DCAMM MS4 Permit Year 8 annual report
Lancaster Complex	Lancaster	Active DCAMM facility and tenant occupied buildings on campus	<b>Active</b> NOI filed July 28, 2003 USEPA: MAR043018 MassDEP: W035906
Glavin Regional Center	Shrewsbury	Unoccupied DCAMM property, acquired by DCAMM on July 1, 2014	<b>Active</b> – added to DCAMM MS4 Permit Year 12 annual report
Fisheries & Wildlife Headquarters	Westborough	Active tenant occupied property, acquired by DCAMM in December 2014	<b>Active</b> – added to DCAMM MS4 Permit Year 14 annual report
Monson Development Center	Palmer	Unoccupied DCAMM property acquired by DCAMM in 2015	<b>Active</b> – added to DCAMM MS4 Permit Year 13 annual report
National Guard / Department of Corrections	Milford	DCAMM transitioned ownership to Department of Corrections in October 2016	<b>Terminated</b> – added to DCAMM MS4 Permit Year 13 annual report, remove MS4 Permit Year 14
Worcester Recovery Center & Hospital	Worcester	DCAMM retains management of Central Heating Plant and vacant Bryan Building since 2015	<b>Active</b> – added to DCAMM MS4 Permit Year 13 annual report
Oakdale Complex	West Boylston	DCAMM sold property	<b>Terminated</b> NOI filed July 28, 2003 USEPA: MAR043021 MassDEP: W039898
Medfield State Hospital	Medfield	DCAMM sold 127 acres of property to Town of Medfield in 2014, sold another large acreage of property to Department of Conservation and Recreation (DCR) in 2015, and DCAMM's remaining property is not equipped with stormwater discharges.	<b>Terminated</b> NOI filed July 28, 2003 USEPA: MAR043019 MassDEP: W037313
Foxborough Hospital	Foxborough	DCAMM sold location September 26, 2005	<b>Terminated</b> NOI filed July 28, 2003 USEPA: MAR043020 MassDEP: W035659 NOT filed March 2007

Since the expiration of the 2003 Small MS4 Permit, USEPA has issued several new versions of a Small MS4 Permit for public comment and review. In 2010, two new permits were drafted for public review that included a permit for Massachusetts for Operators located in the North Coastal watershed and a permit for Operators located in Interstate, Merrimack, and South Coastal watersheds. The USEPA held public meetings in March 2011 and allowed for public comments. These permits were not adopted to replace the expired 2003 Small MS4 Permit. A draft Massachusetts Small MS4 General Permit was released for public comment in September 2014, which was reviewed by the public in early 2015. On April 4, 2016, the USEPA and Massachusetts Department of Environmental Protection (MassDEP) issued the final Massachusetts Small MS4 General Permit, which incorporated the changes made based upon the public comments received. The Small MS4 Permit was issued with an effective date of July 1, 2017, which would end the permit cycle for DCAMM properties. New permits should be obtained under the newly issued permit. In April of 2017 the courts delayed the issuing of the new Massachusetts Small MS4 General Permit. On June 29th, 2017 the USEPA issued a memorandum stating the postponement of the July 1, 2017 effective date of the Massachusetts Small MS4 General Permit to July 1, 2018.

## **IIC. PERMIT IMPLEMENTATION SCHEDULE**

The 2003 Small MS4 Permit was implemented at the regulated DCAMM facilities over the permit cycle time period beginning in July of 2003. Several iterations of BMP manuals were developed for DCAMM facilities to provide Standard Operating Procedures (SOPs) for typical facility operations and activities to reduce and eliminate contamination that may enter DCAMM facilities' stormwater drainage systems. DCAMM has historically complied with the permit conditions under the 2003 Small MS4 Permit as reported and described in Section III of this report.

The focus for the DCAMM stormwater program in 2017/2018 was directed at meeting the conditions of the newly issued Massachusetts Small MS4 General Permit.

### **Part III. Summary of Minimum Control Measures**

DCAMM is classified as a non-traditional small MS4 community. The Agency manages several occupied and unoccupied properties throughout the State, which are regulated under the 2003 Small MS4 Permit. This section of the annual report includes a summary of the implemented Minimum Control Measures (MCM) at regulated DCAMM facilities listed in Part II Table 1.

#### **1. Public Education and Outreach**

The public education program was identified by DCAMM employees who oversee and manage the properties. In 2016, DCAMM's MS4 program manager, Danelle Tudor, who coordinated the stormwater program for regulated programs, left the Agency. Directly following her departure, the Agency was reorganized, and a new program manager was not assigned until the summer of 2017. A new general services contract was issued and approved in September 2017. Training for DCAMM employees was not provided in this report cycle year during this transition. The focus for the DCAMM stormwater program in 2017/2018 was directed at meeting the conditions of the newly issued Small MS4 Permit and the development of new BMPs for meeting MCM.

#### **2. Public Involvement and Participation**

DCAMM historically complied with the public notice requirement and does not require additional BMPs for this MCM under the 2003 Small MS4 Permit. DCAMM provides a public records request form on the Agency's website for the public to inquire about stormwater programs at applicable regulated facilities.

#### **3. Illicit Discharge Detection and Elimination (IDDE)**

DCAMM developed storm sewer system mapping for 2003 Small MS4 Permit regulated facilities and newly acquired DCAMM facilities located in regulated areas. DCAMM developed and implemented an IDDE Plan to detect and address non-stormwater discharges, including illegal dumping into storm sewer systems. Investigations of the storm sewer systems were completed during the 2003 Small MS4 Permit cycle.

Additional BMP actions are not required for meeting this MCM under the 2003 Small MS4 Permit.

#### **4. Construction Site Stormwater Runoff Control**

DCAMM developed, implemented, and enforces a program that aims to reduce pollutants in stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre.

DCAMM requires the use of sediment and erosion control practices and waste management control measurements at construction projects on DCAMM properties. Contractors and employees are required to manage construction projects in accordance with DCAMM's Design/Bid/Build Standard Specifications (Specifications). A number of sections of these

Specifications address construction site stormwater runoff control measures that must be implemented, including:

- Division 01 Section 013543 Environmental Protection Procedures;
- Division 01 Section 017419 Construction Waste Management and Disposal;
- Division 31 Section 311000 Site Clearing;
- Division 31 Section 312000 Earth Moving;
- Division 31 Section 312319 Dewatering; and
- Division 31 Section 312500 Erosion and Sedimentation Controls.

Construction site inspections and enforcement of sediment and erosion control measures are completed in accordance with DCAMM's Specification requirements for a site specific Stormwater Pollution Prevention Plan (SWPPP). Responsibility for inspections are assigned for each construction project as defined in the project SWPPP. DCAMM maintains the ability to enforce policies and procedures in accordance with the Specifications that meet the permit conditions with contractors during construction projects.

Additional BMP actions are not required for meeting this MCM under the 2003 Small MS4 Permit.

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

DCAMM does not typically have new development or redevelopment of properties subject to the 2003 Small MS4 Permit. Consistent with construction site stormwater runoff control MCM, DCAMM has developed, implemented, and enforces a program that addresses stormwater runoff from new development and redevelopment projects that disturb greater than one acre and discharge into the MS4 in the event a project was subject to this requirement.

Additional BMP actions are not required for meeting this MCM under the 2003 Small MS4 Permit.

## **6. Pollution Prevention and Good Housekeeping in Municipal Operations**

DCAMM has historically provided employee training annually; however, with the staff changes made in this report cycle and re-organization, stormwater training was not completed. Several iterations of BMP manuals were developed for DCAMM facilities to provide SOPs for typical facility operations and activities to reduce and eliminate contamination that may enter DCAMM facilities' stormwater drainage systems.

The focus for the DCAMM stormwater program in 2017/2018 was directed at meeting the conditions of the newly issued Small MS4 Permit and the development of new BMPs for meeting MCM.

## **7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)**

This section of the report is not applicable as DCAMM facilities are not subject to TMDL WLA under the 2003 Small MS4 Permit.

#### **Part IV. Summary of Information Collected and Analyzed**

New data was not collected and/or analyzed over the reporting cycle.