Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part I: General Conditions

General Information

Name of Municipality or Organization: Veterans Affairs Central Western MA Healthcare System State: MA

EPA NPDES Permit Number (if applicable): MAR042026

Primary MS4 Program Manager Contact Information

Name: Robert Michalik Title: GEMS Program Manager

Street Address Line 1: 421 North Main Street

Street Address Line 2:

City: Leeds State: MA Zip Code: 01053

Email: robert.michalik@va.gov Phone Number: (413) 584-4040

Fax Number:

Other Information

Stormwater Management Program (SWMP) Location (web address or physical location, if already completed): 421 North Main Street, Building 3, Room 224, Leads, MA 01053-9764. Electronic copy available on internal intranet page (not accessible outside organization).

Eligibility Determination

Endangered Species Act (ESA) Determination Complete? Yes

Eligibility Criteria (check all that apply): ☐ A ☐ B ☒ C

National Historic Preservation Act (NHPA) Determination Complete? Yes

Eligibility Criteria (check all that apply): ☒ A ☐ B ☐ C

☑ Check the box if your municipality or organization was covered under the 2003 MS4 General Permit

MS4 Infrastructure (if covered under the 2003 permit)

Estimated Percent of Outfall Map Complete? *(Part II, III, IV or V, Subpart B.3.(a.) of 2003 permit)* 100%

If 100% of 2003 requirements not met, enter an estimated date of completion (MM/DD/YY):

Web address where MS4 map is published:

If outfall map is unavailable on the internet an electronic or paper copy of the outfall map must be included with NOI submission (see section V for submission options)

To be submitted with NOI due to lack of outside access to VA intranet.

Regulatory Authorities (if covered under the 2003 permit)

Illicit Discharge Detection and Elimination (IDDE) Authority Adopted? *(Part II, III, IV or V, Subpart B.3.(b.) of 2003 permit)* Yes — Effective Date or Estimated Date of Adoption (MM/DD/YY): 09/01/15

Construction/Erosion and Sediment Control (ESC) Authority Adopted? *(Part II,III,IV or V, Subpart B.4.(a.) of 2003 permit)* Yes — Effective Date or Estimated Date of Adoption (MM/DD/YY): 01/01/11

Post- Construction Stormwater Management Adopted? *(Part II, III, IV or V, Subpart B.5.(a.) of 2003 permit)* Yes — Effective Date or Estimated Date of Adoption (MM/DD/YY): 12/01/09

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part II: Summary of Receiving Waters

Please list the 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.

Massachusetts list of impaired waters: *Massachusetts 2014 List of Impaired Waters*- http://www.mass.gov/eea/docs/dep/water/resources/07v5/14list2.pdf

Check off relevant pollutants for discharges to impaired waterbodies (see above 303(d) lists) without an approved TMDL in accordance with part 2.2.2.a of the permit. List any other pollutants in the last column, if applicable.

Waterbody segment that receives flow from the MS4	Number of outfalls into receiving water segment	Chloride	Chlorophyll-a	Dissolved Oxygen/ DO Saturation	Nitrogen	Oil & Grease/ PAH	Phosphorus	Solids/ TSS/ Turbidity	E. coli	Enterococcus	Other pollutant(s) causing impairments
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Click to lengthen table

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary

Identify the Best Management Practices (BMPs) that will be employed to address each of the six Minimum Control Measures (MCMs). For municipalities/organizations whose MS4 discharges into a receiving water with an approved Total Maximum Daily Load (TMDL) and an applicable waste load allocation (WLA), identify any additional BMPs employed to specifically support the achievement of the WLA in the TMDL section at the end of part III.

For each MCM, list each existing or proposed BMP by category and provide a brief description, responsible parties/departments, measurable goals, and the year the BMP will be employed (public education and outreach BMPs also requires a target audience). **Use the drop-down menus in each table or enter your own text to override the drop down menu.**

MCM 1: Public Education and Outreach

BMP Media/Category (enter your own text to override the drop down menu)	**BMP Description**	**Targeted Audience**	**Responsible Department/Parties** (enter your own text to override the drop down menu)	**Measurable Goal**	**Beginning Year of BMP Imple-mentation**
Brochures/Pamphlets/Infrastructure Markin	Develop and implement targeted public education messages. Distribute messages to target audiences.	Patients	GEMS Program Manager	Development and implementation of a targeted public education program, distribution of messages to audience within Permit timeframes.	2018
Brochures/Pamphlets/Infrastructure Markin	Develop and implement targeted public education messages. Distribute messages to target audiences.	Visitors	GEMS Program Manager	Development and implementation of a targeted public education program, distribution of messages to audience within Permit timeframes.	2018
Newsletters/Emails/Trainings/Intranet	Develop and implement targeted public education messages. Distribute messages to target audiences.	Employees	GEMS Program Manager	Development and implementation of a targeted public education program, distribution of messages to audience within Permit timeframes.	2018

Meetings/Contractor Talks/Contract Langua	Develop and implement targeted public education messages. Distribute messages to target audiences.	Contractors	GEMS Program Manager	Development and implementation of a targeted public education program, distribution of messages to audience within Permit timeframes.	2018

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 2: Public Involvement and Participation

BMP Categorization	Brief BMP Description (enter your own text to override the drop down menu)	Responsible Department/Parties (enter your own text to override the drop down menu)	Additional Description/ Measurable Goal	Beginning Year of BMP Imple-mentation
Public Review	Post/provide the Stormwater Management Plan and Annual Reports fo	GEMS Program Manager	Allow annual review of Annual Reports and SWMP and posting of stormwater management plan on website	2018
Public Participation	Allow/facilitate public participation in review and implementation c	GEMS Program Manager	Allow public to comment on stormwater management plan annually	2019
Public Participation	Partner with/support the City of Northampton's SWMP	GEMS Program Manager	Participate in relevant communication with the City of Northampton, as needed, regarding stormwater program implementation.	2018

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

BMP Categorization (enter your own text to override the drop down menu)	**BMP Description**	**Responsible Department/Parties** (enter your own text to override the drop down menu)	**Measurable Goal** (all text can be overwritten)	**Beginning Year of BMP Imple-mentation**
SSO inventory	Develop SSO inventory in accordance of permit conditions	Facilities Management Services, GEMS Program Manager	Complete within 1 year of effective date of permit	2018
Storm sewer system map	Create map and update during IDDE program completion	Engineering	Update map within 2 years of effective date of permit and complete full system map 10 years after effective date of permit	2018
Written IDDE program	Create written IDDE program	GEMS Program Manager, Engineering Department, Facilities Managemei	Complete within 1 year of the effective date of permit and update as required	2018
Implement IDDE program	Implement catchment investigations according to program and permit conditions	GEMS Program Manager	Complete 10 years after effective date of permit	2019
Employee training	Train employees on IDDE implementation	GEMS Program Manager	Train annually	2018
Conduct dry weather screening	Conduct in accordance with outfall screening procedure and permit conditions	GEMS Program Manager	Complete 3 years after effective date of permit	2019
Conduct wet weather screening	Conduct in accordance with outfall screening procedure	GEMS Program Manager	Complete 10 years after effective date of permit	2020
Ongoing screening	Conduct dry weather and wet weather screening (as necessary)	GEMS Program Manager	Complete ongoing outfall screening upon completion of IDDE program	2023

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 4: Construction Site Stormwater Runoff Control

BMP Categorization (enter your own text to override the drop down menu or entered text)	**BMP Description**	**Responsible Department/Parties** (enter your own text to override the drop down menu)	**Measurable Goal** (all text can be overwritten)	**Beginning Year of BMP Imple-mentation**
Site inspection and enforcement of Erosion and Sediment Control (ESC) measures	Complete written procedures of site inspections and enforcement procedures	Engineering Department	Complete within 1 year of the effective date of permit	2018
Site plan review	Complete written procedures of site plan review and begin implementation	Engineering Department	Complete within 1 year of the effective date of permit	2018
Erosion and Sediment Control	Adoption of requirements for construction operators to implement a sediment and erosion control program	Engineering Department	Complete within 1 year of the effective date of permit	2018
Waste Control	Adoption of requirements to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes	Engineering Department	Complete within 1 year of the effective date of permit	2018

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

BMP Categorization (enter your own text to override the drop down menu or entered text)	**BMP Description**	**Responsible Department/Parties** (enter your own text to override the drop down menu)	**Measurable Goal** (all text can be overwritten)	**Beginning Year of BMP Imple-mentation**
As-built plans for on-site stormwater control	The procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP	Engineering Department	Require submission of as-built plans for completed projects	2018
Target properties to reduce impervious areas	Identify up to 5 permittee-owned properties that could be modified or retrofitted with BMPs to reduce impervious areas and update annually	GEMS Program Manager, Engineering Department	Complete 4 years after effective date of permit and report annually on retrofitted properties	2020
Allow green infrastructure	Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist	GEMS Program Manager, Engineering Department	Complete 4 years after effective date of permit and implement recommendations of report	2020
Street design and parking lot guidelines	Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options.	GEMS Program Manager, Engineering Department	Complete 4 years after effective date of permit and implement recommendations of report	2021

Ensure any stormwater controls or management practices for new development and redevelopment meet the retention or treatment requirements of the permit and all applicable requirements of the Massachusetts Stormwater Handbook	Adoption, amendment, or modification of a regulatory mechanism to meet permit requirements	Engineering Department	Complete 2 years after effective date of permit	2019
Nitrogen Source Identification Report	Develop Nitrogen Source Identification Report containing Permit required elements.	GEMS Program Manager	By end of Permit Year 4.	2021

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 6: Municipal Good Housekeeping and Pollution Prevention

BMP Categorization (enter your own text to override the drop down menu or entered text)	**BMP Description**	**Responsible Department/Parties** (enter your own text to override the drop down menu)	**Measurable Goal** (all text can be overwritten)	**Beginning Year of BMP Imple-mentation**
O&M procedures	Create written O&M procedures including all requirements contained in 2.3.7.a.ii for parks and open spaces, buildings and facilities, and vehicles and equipment	GEMS Program Manager	Complete and implement 2 years after effective date of permit	2019
Inventory all permittee-owned parks and open spaces, buildings and facilities, and vehicles and equipment	Create inventory	GEMS Program Manager, Engineering Department	Complete 2 years after effective date of permit and implement annually	2019
Infrastructure O&M	Establish and implement program for repair and rehabilitation of MS4 infrastructure	Maintenance & Operations Department	Complete 2 years after effective date of permit	2019
Stormwater Pollution Prevention Plan (SWPPP)	Create SWPPPs for maintenance garages, transfer stations, and other waste-handling facilities	GEMS Program Manager	Complete and implement 2 years after effective date of permit	2019
Catch basin cleaning	Establish schedule for catch basin cleaning such that each catch basin is no more than 50% full and clean catch basins on that schedule	Maintenance & Operations Department	Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually	2018
Street sweeping program	Sweep all streets and permitee-owned parking lots in accordance with permit conditions	Maintenance & Operations Department	Sweep all streets and permitee-owned parking lots once per year in the spring	2018
Road salt use optimization program	Establish and implement a program to minimize the use of road salt	Maintenance & Operations Department	Implement salt use optimization during deicing season	2018

Inspections and maitenance of stormwater treatment structures	Establish and implement inspection and maintenance procedures and frequencies	GEMS Program Manager	Inspect and maintain treatment structures at least annually	2018

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

Actions for Meeting Total Maximum Daily Load (TMDL) Requirements

Use the drop-down menus to select the applicable TMDL, action description to meet the TMDL requirements, and the responsible department/parties. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

Applicable TMDL	Action Description	Responsible Department/Parties (enter your own text to override the drop down menu)
Long Island Sound TMDL (Nitrogen)	Adhere to requirements in part B.I of Appendix F	GEMS Program Manager

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

Actions for Meeting Requirements Related to Water Quality Limited Waters

Use the drop-down menus to select the pollutant causing the water quality limitation and enter the waterbody ID(s) experiencing excursions above water quality standards for that pollutant. Choose the action description from the dropdown menu and indicate the responsible party. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

Pollutant	Waterbody ID(s)	Action Description	Responsible Department/Parties (enter your own text to override the drop down menu)
E. Coli	Mill River	Adhere to requirements in part III of Appendix H	GEMS Program Manager

Part IV: Notes and additional information

Use the space below to indicate the part(s) of 2.2.1and 2.2.2 that you have identified as not applicable to your MS4 because you do not discharge to the impaired water body or a tributary to an impaired water body due to nitrogen or phosphorus. Provide all supporting documentation below or attach additional documents if necessary.
Also, provide any additional information about your MS4 program below.

See attachments for supporting documentation.

The "Final Massachusetts Year 2014 Integrated List of Waters" and related MassGIS viewer were used to make the determination of applicable parts of 2.2.1 and 2.2.2 to the VA CWM's MS4 stormwater program. The facility ultimately discharges to the Mill River (Segment ID MA34-28), which has a TMDL for Escherichia coli. Because of this, the VA CWM will adhere to all applicable bacteria related requirements. No impairments were identified for this waterbody. The VA CWM is also located within the Connecticut River watershed, which has a TMDL for nitrogen. The VA CWM will also adhere to all applicable nitrogen related requirements.

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part V: 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, I certify that 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.

Name:	Andrew T. McMahon	Title:	Medical Center Associate Director
Signature:	[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]	Date:	09/18/18

Note: When prompted during signing, save the document under a new file name

MS4 GENERAL PERMIT
NOI SUPPORTING DOCUMENTATION

(Endangered Species Determination Letter, Historic Properties Determination Letter, MS4 Map)

COMMITMENT & INTEGRITY
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Providence, Rhode Island 02903
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WOODARD
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Via Electronic Mail

September 19, 2018

Mr. Newton Tedder
US Environmental Protection Agency
Stormwater and Construction Permits Section (OEP06-1)
Five Post Office Square, Suite 100
Boston, MA 02109

Re: MA MS4 General Permit Endangered Species Determination - VA Central Western Massachusetts Healthcare System, 421 North Main Street, Leeds, MA - #MAR042026

Dear Mr. Tedder:

The Veterans Affairs Central Western Massachusetts Healthcare System (VA CWM, site) is a federal, non-traditional MS4 designated by the U.S. Environmental Protection Agency (EPA) for conducting formal or informal consultation with the U.S. Fish and Wildlife Service as a condition of coverage under the 2016 MS4 General Permit (Permit).

Woodard & Curran, on behalf of the VA CWM, has evaluated the U.S. Fish & Wildlife Service iPAC Biological and Conservation Data System files in accordance with the methodology presented in Appendix C of the Permit to determine the presence of endangered or threatened species within the program implementation area.

Our review evaluated the area of impact related to required program activities, analysis of these program activity areas within the iPAC database, examining maps, and the personal knowledge of staff and/or cooperating experts with knowledge of site operations.

According to the information currently in the iPAC database, one listed endangered species is located within the vicinity of the VA CWM: the Northern Long-eared Bat. No threatened or candidate species and no critical habitat were identified within the project area. The formal U.S. Fish and Wildlife Service consultation response letter is provided as an attachment to this letter. The proposed stormwater program activities being conducted at the VA CWM are a continuation of previous permitted activities and include non-structural management of stormwater runoff as required by the Permit. These activities will include education, investigation, and pollutant source control on existing facilities and roadways and will not disturb terrestrial vegetation. As such, activities associated with implementation of the Permit requirements will continue to have "no effect" to the habitats receiving stormwater discharges from the site.

The VA CWM will continue to evaluate potential effects to threatened, endangered, or candidate species and critical habitat related to installation of structural stormwater treatment practices or other land disturbing activities enacted as a result of maintaining compliance with the Permit, and initiate either informal or formal consultation with the U.S. Fish and Wildlife Services to determine potential impacts.

Based on this review and an evaluation of determination requirements outlined in Appendix C of the Permit, we have determined that the VA CWM meets Criterion C.

Please do not hesitate to contact either of the undersigned if you have any questions about the VA CWM's stormwater management program.

Sincerely,

Robert Michalik
GEMS Program Manager
VA CWM
Robert.Michalik@va.gov
1-413-584-4040

Janelle Bonn
Project Scientist
Woodard & Curran
jbonn@woodardcurran.com
1-401-427-1314

Enclosures

cc: William Kulas, VA

PN: 229618

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
http://www.fws.gov/newengland

In Reply Refer To: August 07, 2018
Consultation Code: 05E1NE00-2018-SLI-2638
Event Code: 05E1NE00-2018-E-06168
Project Name: VA Northampton, MA Medical Campus MS4 General Permit

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
(603) 223-2541

Project Summary

Consultation Code: 05E1NE00-2018-SLI-2638

Event Code: 05E1NE00-2018-E-06168

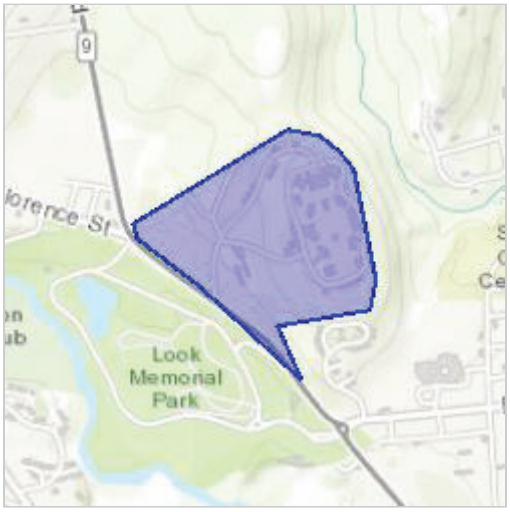
Project Name: VA Northampton, MA Medical Campus MS4 General Permit

Project Type: ** OTHER **

Project Description: This determination is being conducted in support of Notice of Intent requirements under the recently reissued MS4 General Permit. MS4 Operations are ongoing throughout the site, which operates as a Veterans Administration medical campus.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/42.34880746668145N72.68426761531549W



Counties: Hampshire, MA

Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

---

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

COMMITMENT & INTEGRITY
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WOODARD &CURRAN

Via Electronic Mail

September 19, 2018

Mr. Newton Tedder
US Environmental Protection Agency
Stormwater and Construction Permits Section (OEP06-1)
Five Post Office Square, Suite 100
Boston, MA 02109

Re: MA MS4 General Permit Historic Properties Evaluation – VA Central Western Massachusetts Healthcare System, 421 North Main Street, Leeds, MA - #MAR042026

Dear Mr. Tedder:

Woodard & Curran, on behalf of the Veterans Affairs Central Western Massachusetts Healthcare System (VA CWM, site) has determined that the discharges regulated under the 2016 MS4 General Permit (Permit) do not have the potential to cause effects to any properties listed on the National Register of Historic Places. The VA CWM is an existing facility authorized by the previous 2003 MS4 General Permit. Using the screening process presented in Appendix D of the Permit, the VA CWM is eligible for Permit coverage under Criterion A.

During an evaluation of the site's MS4 operations it was determined that the site is designated as part of a "Historic District" on the National Register of Historic Places. However; no properties or structures are located within areas or proximity to known stormwater discharges, allowable non-stormwater discharges, and/or stormwater discharge related activities originating from the VA CWM that would affect properties that are listed or eligible for listing on the National Register of Historic Places. This information will be periodically verified throughout the Permit term to determine whether additional actions are required to mitigate the effects of stormwater discharges to historic properties, should they occur. It is important to note that no historic properties are located within proximity to the site.

Please do not hesitate to contact either of the undersigned if you have any questions about the VA CWM's stormwater management program.

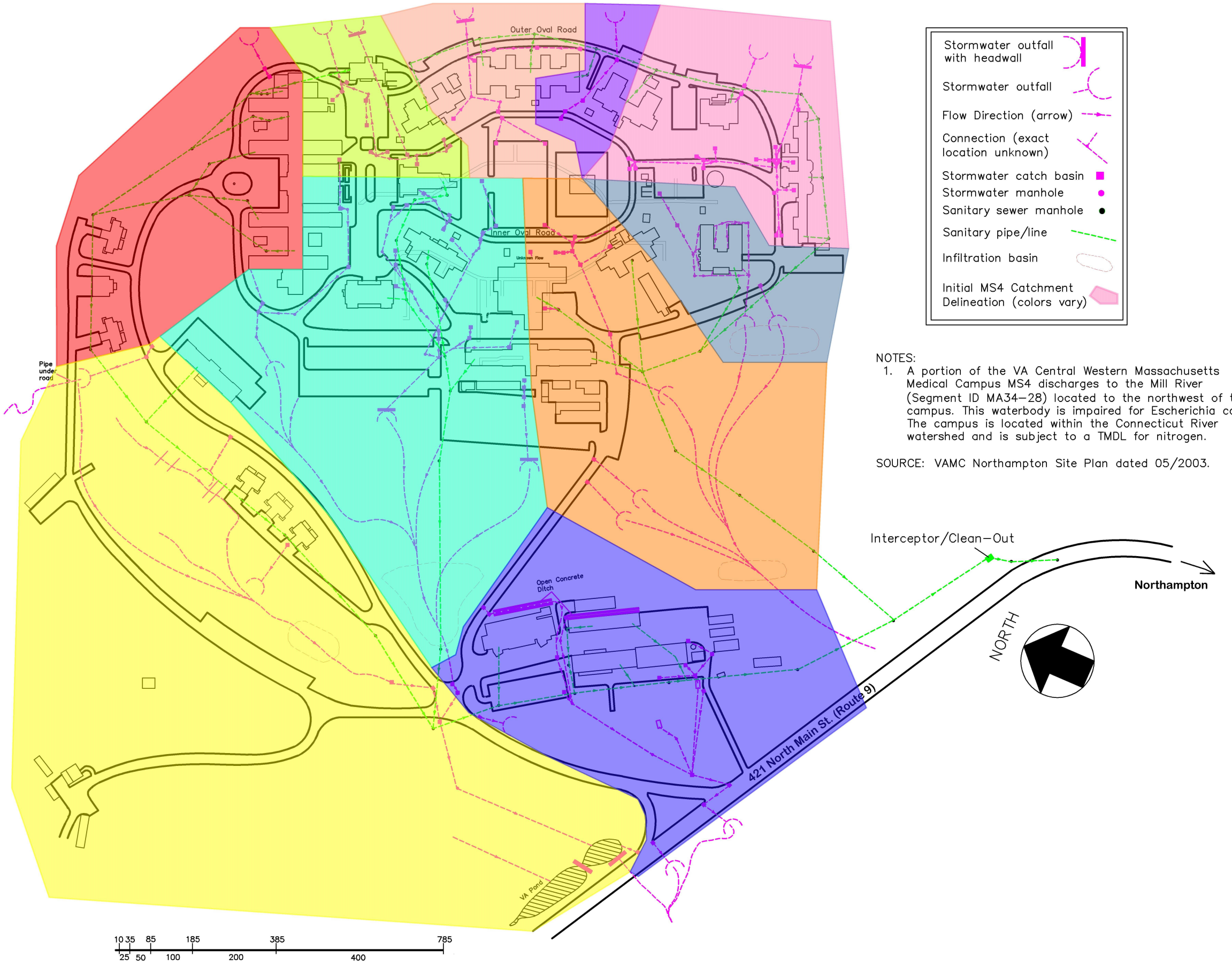
Sincerely,

Robert Michalik
GEMS Program Manager
VA CWM
Robert.Michalik@va.gov
1-413-584-4040

Janelle Bonn
Project Scientist
Woodard & Curran
jbonn@woodardcurran.com
1-401-427-1314

cc: William Kulas, VA

PN: 229618



Stormwater outfall with headwall

Stormwater outfall

Flow Direction (arrow)

Connection (exact location unknown)

Stormwater catch basin

Stormwater manhole

Sanitary sewer manhole

Sanitary pipe/line

Infiltration basin

Initial MS4 Catchment Delineation (colors vary)

NOTES:

1. A portion of the VA Central Western Massachusetts Medical Campus MS4 discharges to the Mill River (Segment ID MA34-28) located to the northwest of the campus. This waterbody is impaired for Escherichia coli. The campus is located within the Connecticut River watershed and is subject to a TMDL for nitrogen.

SOURCE: VAMC Northampton Site Plan dated 05/2003.

47 Pleasant Street, Suite #1-SW
Northampton, Massachusetts 01060
800.426.4262 | www.woodardcurran.com

COMMITMENT & INTEGRITY DRIVE RESULTS

WOODARD & CURRAN

MS4 MAP

DESIGNED BY: MJE
DRAWN BY: MJE
CHECKED BY: JB
NORTHAMPTON MS4 FIGURE *.dwg

VA CENTRAL WESTERN MASSACHUSETTS CAMPUS

FIGURE 2

JOB NO: 229618
DATE: SEPT 2018
SCALE: ON PLAN

\\wc\shares\Projects\229618 VAMC - New England Healthcare PSDM\wip\Phase 002 MS4\Northampton\DWG\Northampton MS4 Figure 2.dwg, Sep 18, 2018 - 12:36pm

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part V: 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, I certify that 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.

Name:	Andrew T. McMahon	Title:	Medical Center Associate Director
Signature:	*[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]*	Date:	09/18/18

Note: When prompted during signing, save the document under a new file name

From: Michalik, Robert E.
To: Tedder, Newton
Cc: Reports Stormwater; jbonn.woodardcurran.com
Subject: RE: Small MS4 NOI submission - additional or corrected information required
Date: Thursday, October 04, 2018 11:00:06 AM

Good morning Mr. Tedder,

Per your email from October 3, 2018, here are our responses to your request for additional information:

1) The VA CWM will deliver a total of 8 educational messages to our identified public audience (visitors, patients, employees, and contractors).

2) A hard copy signature page was mailed via certified mail to your attention on September 26, 2018.

Please let me know if you need any further clarification.

Thank you,

Have a great weekend!

Sincerely,

Robert E. Michalik

Robert E. Michalik MPH
Environmental Protection Specialist / GEMS Program Manager
VA Central Western Massachusetts Healthcare System
Building 3, Room 224
421 North Main Street
Leeds, MA 01053-9764
(413) 584-4040 ext. 2330/ 1330
Robert.Michalik@va.gov

LinkedIn: http://www.linkedin.com/pub/robert-michalik/1a/b4/822

-----Original Message-----
From: Tedder, Newton [mailto:Tedder.Newton@epa.gov]
Sent: Wednesday, October 03, 2018 5:32 PM
To: Michalik, Robert E. <Robert.Michalik@va.gov>; jbonn.woodardcurran.com <jbonn@woodardcurran.com>
Cc: Reports Stormwater <Stormwater.Reports@epa.gov>
Subject: [EXTERNAL] Small MS4 NOI submission - additional or corrected information required

EPA requires additional or corrected information to receive a complete NOI submission for your MS4 and continue the review process.

Please respond to this email with the requested details in the attached report. You do not need to resubmit your entire NOI form. Please respond with the requested information as soon as you can. If the additional information is not received within 30 days of the date on this email EPA may initiate the process to deny your NOI, unless additional time is granted by EPA for such submission.

Newton W. Tedder
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OEP06-4
Boston, MA 02109-3912
Phone: (617) 918-1038

All drains lead to the ocean