

**Year 1 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: May 1, 2018-June 30, 2019**

*\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\**

*Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed.*

**Part I: Contact Information**

Name of Municipality or Organization: Veterans Affairs Boston Healthcare System Brockton Campus

EPA NPDES Permit Number: MAR042009

**Primary MS4 Program Manager Contact Information**

Name: John Hughes

Title: GEMS Program Manager

Street Address Line 1: 940 Belmont Street

Street Address Line 2: na

City: Brockton

State: MA

Zip Code: 02301

Email: John.Hughes5@va.gov

Phone Number: (774) 826-2345

Fax Number: na

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): GEMS office, Bldg. 1, Rm. 010.

Date SWMP was Last Updated: Sep. 7, 2018

If the SWMP is not available on the web please provide the physical address and an explanation of why it is not posted on the web:

VA Boston Healthcare System - Brockton, 940 Belmont Street, Brockton, MA 02301. SWMP is posted on an internal VA website. VA does not post management documents on external website.

## Part II: Self Assessment

*First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.*

**Impairment(s)**

Bacteria/Pathogens       Chloride       Nitrogen       Phosphorus  
 Solids/ Oil/ Grease (Hydrocarbons)/ Metals

**TMDL(s)**

*In State:*       Assabet River Phosphorus       Bacteria and Pathogen       Cape Cod Nitrogen  
 Charles River Watershed Phosphorus       Lake and Pond Phosphorus

*Out of State:*       Bacteria/Pathogens       Metals       Nitrogen       Phosphorus

Clear Impairments and TMDLs

*Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.*

### Year 1 Requirements

- Develop and begin public education and outreach program
- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
  - The SSO inventory is attached to the email submission
  - The SSO inventory can be found at the following website:
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- IDDE ordinance complete
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
  - The priority ranking of outfalls/interconnections is attached to the email submission
  - The priority ranking of outfalls/interconnections can be found at the following website:
- Construction/ Erosion and Sediment Control (ESC) ordinance complete
- Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- Develop written procedures for site plan review
- Keep a log of catch basins cleaned or inspected
- Complete inspection of all stormwater treatment structures

### Annual Requirements

- Annual opportunity for public participation in review and implementation of SWMP
- Comply with State Public Notice requirements
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- All curbed roadways have been swept a minimum of one time per year

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

The IDDE Program Manual was completed at the end of June and proactively includes the Catchment Investigation Procedures due at the end of this year.

The campus MS4 was CCTV'd in August 2019 to obtain an accurate understanding of the extent and condition of MS4 infrastructure. Outfalls and interconnection locations were confirmed during the CCTV investigation. This information will be integrated into the priority rankings prior to December 31, 2019.

The State Public Notice requirements are not applicable to the VA BHS Brockton. The "public" is reached through internal notification procedures, such as emails and newsletters. The SWMP and Annual Reports are available internally for public review.

### **Part III: Receiving Waters/Impaired Waters/TMDL**

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

Yes  No

If yes, describe below, including any relevant impairments or TMDLs:

## Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

### MCM1: Public Education

Number of educational messages completed during the reporting period:

Below, report on the educational messages completed during the first year. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

#### **BMP:[Bacteria and Pathogens]**

Message Description and Distribution Method:

Messaging Pet Waste is conducted through Grounds/Engineering general awareness training and during department meetings.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Dissemination of educational messaging related to applicable bacteria/pathogen impacts within permit time frames and frequencies. No visible pet waste present on grounds or within MS4 infrastructure. The campus is proactively completing this messaging. The campus MS4 does not discharge to any impaired/TMDL waterbodies.

Message Date(s):

Message Completed for: Appendix F Requirements  Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes  No

If yes, describe why the change was made:

### MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) during the reporting period:

SWMP development included data provision and feedback from various VA personnel involved in activities that relate to MS4 operations and included discussions related to construction inspections, employee

engagement during training sessions, conversations with leadership, and review of local, state, and federal regulatory initiatives and environmental conditions.

Was this opportunity different than what was proposed in your NOI? Yes  No

Describe any other public involvement or participation opportunities conducted during the reporting period:  
Conducted Earth Day Clean ups with employees.

**MCM3: Illicit Discharge Detection and Elimination (IDDE)**

**Sanitary Sewer Overflows (SSOs)**

*Below, report on the number of SSOs identified in the MS4 system and removed during this reporting period.*

Number of SSOs identified: 0

Number of SSOs removed: 0

*Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.*

Total number of SSOs identified: 0

Total number of SSOs removed: 0

**MS4 System Mapping**

Describe the status of your MS4 map, including any progress made during the reporting period:

The VA BHS Brockton is in the process of updating their existing MS4 map with information obtained during surveys conducted in 2015 and CCTV activities conducted in August 2019, including updated outfall/interconnection information, catchment delineations, outfall/interconnection spatial location, pipes, manholes, catch basins, sanitary sewer system, storm sewer size and material, topography, and orthophotography.

**Screening of Outfalls/Interconnections**

*If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.*

- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

Outfall screening is planned to be completed prior to December 2019.

*Below, report on the number of outfalls/interconnections screened during this reporting period.*

Number of outfalls screened: 0

*Below, report on the percent of total outfalls/ interconnections screened to date.*

Percent of total outfalls screened: 0

### **Catchment Investigations**

*If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.*

- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following website:

*Below, report on the number of catchment investigations completed during this reporting period.*

Number of catchment investigations completed this reporting period: 0

*Below, report on the percent of catchments investigated to date.*

Percent of total catchments investigated: 0

*Optional: Provide any additional information for clarity regarding the catchment investigations below:*

### **IDDE Progress**

*If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.*

- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

No illicit discharge report is attached to this submission. This box could not be unchecked.

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period.*

Number of illicit discharges identified: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: not applicable [UNITS]

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed since the effective date of the permit.*

Total number of illicit discharges identified: Total number of illicit discharges removed: 

*Optional:* Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

### **Employee Training**

Describe the frequency and type of employee training conducted during the reporting period:

All new employees receive training during New Employee Orientation. Employees receive general awareness training during department meetings. Staff received MS4 General Permit and Storm Water Management Plan overview training in May 2018. Staff also received specific training on the IDDE Program Manual contents and how to conduct field screening/sampling activities in July 2019.

### **MCM4: Construction Site Stormwater Runoff Control**

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed during this reporting period.*

Number of site plan reviews completed: Number of inspections completed: Number of enforcement actions taken: 

### **MCM5: Post-Construction Stormwater Management in New Development and Redevelopment**

#### **Ordinance Development**

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

The VA, as a federal entity, abides by Section 438 of the Energy Independence and Security Act (EISA) for all proposed construction projects on campus. Section 438 EISA requires equal or more stringent post-construction requirements for new and redevelopment than what is presented in the MS4 General Permit and applies to all construction projects greater than or equal to 5,000 square feet.

#### **As-built Drawings**

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

The VA has specifications in place that require the submittal of as-built plans within 1 year of the completion of the project. Long term O&M plan submittal is a contractually mandated requirement of contractors.

**Street Design and Parking Lots Report**

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

The VA BHS Brockton Campus is currently reviewing the requirements of this assessment as it pertains to this facility. VABHS Brockton has a future construction project planned that will add oil-water separators to new storm drains.

**Green Infrastructure Report**

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

The VA BHS Brockton campus is currently reviewing the requirements of this report and assessing all construction projects scheduled for design over this time period for compliance with this requirement. Although this requirement is not applicable to non-traditional MS4s, this facility is considering practices such as green roofs, rain gardens, etc. to potentially be implemented as part of Section 438 EISA requirements in new/redevelopment areas.

**Retrofit Properties Inventory**

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

This inventory is in progress.

**MCM6: Good Housekeeping**

**Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

Plan is completed and presented in Section 9.4.1 of the Stormwater Management Plan

*If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:*

- The catch basin cleaning optimization plan or schedule is attached to the email submission
- The catch basin cleaning optimization plan or schedule can be found at the following website:

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins during this reporting period.*

Number of catch basins inspected:

Number of catch basins cleaned:

Total volume or mass of material removed from all catch basins:  [UNITS]

*Below, report on the total number of catch basins in the MS4 system, if known.*

Total number of catch basins:

*If applicable:*

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

VABHS Brockton has catch basin cleaning scheduled for October 2019.

**Street Sweeping**

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

Procedures are complete and are presented in Section 9.4.2 of the Stormwater Management Plan.

*Report on street sweeping completed during the reporting period using one of the three metrics below.*

Number of miles cleaned:

Volume of material removed:  [UNITS]

Weight of material removed:  [tons]

*If applicable:*

For rural uncurbed roadways with no catch basins, describe the progress of the inspection, documentation, and targeted sweeping plan:

Not applicable

**Winter Road Maintenance**

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

Procedures are complete and are presented in Section 9.4.3 of the Stormwater Management Plan.

**Inventory of Permittee-Owned Properties**

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

This inventory is complete. The VA has a complete inventory of all buildings, vehicles, and equipment.

**O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment**

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

The campus is currently compiling existing procedures and creating new procedures compliant with Permit requirements for this control measure.

**Stormwater Pollution Prevention Plan (SWPPP)**

Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

This task has been contracted to a third party to be evaluated in an upcoming fiscal year to determine whether SWPPPs are relevant for these facilities, where present.

*Below, report on the number of site inspections for facilities that require a SWPPP completed during this reporting period.*

Number of site inspections completed:

Describe any corrective actions taken at a facility with a SWPPP:

[Empty rectangular box]

**O&M Procedures for Stormwater Treatment Structures**

Describe the status of the written procedure for stormwater treatment structure maintenance:

This procedure is complete and referenced in Section 9.4.4 of the Stormwater Management Plan. Stormwater treatment structure specific operation and maintenance procedures are evaluated and noted concurrently with O&M plan submittals discussed in MCM 5, As-Built Drawings.

**Additional Information**

**Monitoring or Study Results**

*Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.*

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

[Empty rectangular box]

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

[Empty rectangular box]

**Additional Information**

*Optional:* Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

[Empty rectangular box]

**Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 2 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures
- Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; review annually and update as necessary
- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (*18 months*)

#### Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:

## Part V: Certification of Small MS4 Annual Report 2019

### 40 CFR 144.32(d) 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:

Title:

Signature:

Date:

*[Signatory may be a duly authorized representative]*