AH (Tewksbury Hospital) MAR043005

The Commonwealth of Massachusetts

Executive Office of Health and Human Services
Department of Public Health
250 Washington Street, Boston, MA 02108-4619

MAR043004 Mass. Hospital School

MITT ROMNEY
GOVERNOR

KERRY HEALEY
LIEUTENANT GOVERNOR

RONALD PRESTON
SECRETARY

CHRISTINE C. FERGUSON
COMMISSIONER

Ginny Scarlett
Massachusetts Department of Environmental Protection
Office of Watershed Management
627 Main Street, 2nd floor
Worcester, MA 01608

JUL 31 2003
MUNICIPAL ASSISTANCE UNIT

Thelma Murphy
United States Environmental Protection Agency
Region 1
Office of Ecosystem Protection
1 Congress St, Suite 1100 (CMU)
Boston, MA 02114-2023

July 25, 2003

Dear Ms. Scarlett and Ms. Murphy:

Attached is a new Notice of Intent (NOI) for coverage under the NPDES general stormwater permit for small MS4s for two Massachusetts Department of Public Health (MDPH) facilities. Please use this information and the new certifications instead of the items submitted for the previous March 10, 2003 deadline. As these are "nontraditional" MS4 facilities, we would like to take the opportunity to further explain some of the information contained in these applications.

The Massachusetts Department of Public Health properties include four hospital facilities. Based on the criteria in the general permit, and discussions with EPA, we have determined that two of these facilities (Tewksbury Hospital in Tewksbury, and Massachusetts Hospital School in Canton) are required to get coverage under the general permit for small MS4s. We have applied to EPA for a determination of "non applicability" for Lemuel Shattuck

Hospital in Jamaica Plain, and have applied for, and received, a waiver for the Western Massachusetts Hospital in Westfield.

We are now submitting an NOI for the two other campus-type hospital facilities. While the mix of specific programs is different at each facility, all of them have a number of separate state and non-governmental organizations (NGOs) using the buildings and grounds along with the MDPH functions. We have tried to select our best management practices (BMPs) to identify and address the different audiences. We intend that during the first five-year permit term, some of the BMPs we have selected will become more specific as we identify the most appropriate audiences and methods of achieving overall water quality improvements. Additional information will be elucidated in each yearly report required by the permit.

Much of the work to be carried out for this permit will be undertaken by specific departments at each of the facilities. These are identified in each BMP listing in the permit by department name. The Facilities department is typically responsible for the physical functioning of all aspects of the facility and is key in all other environmental compliance activities. The Human Resources department is responsible for employee hiring, training and communication. Some of the BMP activities will be performed more centrally, for all facilities, or in coordination with the central DPH office; these include BMPs where the responsible party listing includes "compliance officer."

Generally, major construction and renovation projects at our facilities are not under direct agency control. The Division of Capital Asset Management (DCAM) is responsible for financing and overseeing projects of that approach or exceed a million dollars. Any projects which we would anticipate could exceed the one-acre footprint which triggers the construction requirements would be DCAM projects. Therefore, we have listed "working with DCAM" as the primary BMP under category 4. Relevant DCAM staff are aware of their significant role in this process and have already started making changes to their contract language for stormwater compliance. We have already discussed this issue with them relative to our NOI filing. DCAM will also have significant involvement in the development of post-construction stormwater controls, although operation and maintenance of any such will become the facilities responsibility. Other BMPs requiring significant capital funding will also require DCAM assistance. The state's Operational Services Division (OSD) oversees contracting for the state; we are committing to working with them to ensure that relevant contracts, such as those for

landscaping, vehicle maintenance, and supply purchasing have suitable mechanisms to help the facilities achieve stormwater control.

We hope that this information is helpful to you in reviewing the attached NOIs. If you have additional questions relative to this application, or require more specific information, please feel free to contact Ruth Alfasso, of our Bureau, at (617) 624-5757.

Sincerely,

Suzanne K. Condon, Assistant Commissioner
Bureau of Environmental Health Assessment

cc. Elaine T. Krueger, Director, Environmental Toxicology, BEHA
Ruth Alfasso, Compliance Officer, BEHA
James Ballin, Deputy General Counsel
Sarah Bachrach, Hospital Bureau
Phil McCauley, Hospital Bureau
Raymond Sanzone, CEO, Tewksbury Hospital
William Kelleher, Facilities, Tewksbury Hospital
Phil Dould, Acting CEO, Mass Hospital School
Rick Pollara, Facilities, Mass Hospital School

Attachments: NOI for Tewksbury Hospital, DEP transmittal #W035389
NOI for Massachusetts Hospital School, DEP transmittal #035181

MAR043004

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

W035181
Transmittal Number

BRP WM 08A NPDES Stormwater General Permit

Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

Facility ID (if known)

A. Instructions

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

Submission of this Notice of Intent constitutes notice that the entity named at item B1. of this form intends to be authorized by the DEP General Permit issued jointly with EPA for stormwater discharges from the small municipal separate storm sewer system (MS4), in the location identified at item B2. of this form. Submission of the Notice of Intent also constitutes notice that the party identified at item B1. has read, understands and meets the eligibility conditions of Part I.B. of the NPDES Small MS4 General Permit, agrees to comply with all applicable terms and conditions of the NPDES Small MS4 General Permit, and understands that continued authorization to discharge is contingent on maintaining eligibility for coverage. **In order to be granted coverage, all information required on BRP WM 08A, including the Stormwater Management Program Summary and Time Frames form, must be completed. Please read the permit and make sure you comply with all requirements, including the requirement to develop and implement a stormwater management program.**

B. Applicant Information

1. Small MS4 Operator/Owner Information:

   Masachusetts Hospital School, Phil Dould, Acting CEO
   Name

   3 Randolph St.
   Mailing Address

   Canton — City/Town
   MA — State

   (781) 828-2440 — Telephone Number
   Email (if available)

2. Municipality Name

   Canton
   City/Town

3. Legal Status:

   ☐ Federal ☐ City/Town ☒ State ☐ Tribal ☐ Private

   ☐ Other public entity: _____ Specify Public Entity

4. Other regulated MS4(s) within municipal boundaries:

   This MS4 is wholly enclosed within the town of Canton, itself a small MS4

5. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for "listed species" and critical habitat been met?

   ☒ yes ☐ pending ☐ no

JUL 31 2003
MUNICIPAL ASSISTANCE UNIT

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit

Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

W035181
Transmittal Number

Facility ID (if known)

B. Applicant Information (cont.)

6. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for protection of historic properties been met?

☒ yes ☐ pending ☐ no

Note: Section C may be duplicated to accommodate a larger list of receiving waters

C. Names of (Presently Known) Receiving Waters

Receiving Water:	No. of Outfalls	Listed as Impaired?	Impairment
Reservior Pond (Name)	1 (Number)	☒ Yes ☐ No	Exotic species (category 4c) (Specify)
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify

JUL 31 2003
MUNICIPAL ASSISTANCE UNIT

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit

Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

W035181
Transmittal Number

Facility ID (if known)

D. Stormwater Management Program Summary

1. Public Education:

B1-1
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Brochure development and distribution	Facilities Management and Human Resources	esign educational brochure and distribute to all staff, visting groups and others

B1-2
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Identify all groups using facility for targeting information, notices.	Facilities Management and Human Resources	List of groups with contact names and contact information (to be updated yearly)

B1-3
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Integrate education and good housekeeping into orientation and yearly training materials	Facilities Management and Human Resources	All new staff get training materials on hazardous materials, stormwater, as part of orientation. Records kept with personnel files.

B1-4
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Develop Curriculum for School on stormwater	Facilities Management and Teachers to be determined	Stormwater issues added to existing environmental curriculum. Handouts to be developed for distribution

B1-5
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Guest speaker on stormwater and other environmental issues	Facilities Management and Compliance Officer	One presentation with handouts and/or posters. May be done in coordination with other DPH facilities

2. Public Participation:
(There is overlap between items under 1 and 2)

B2-1
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Compile list of existing related activities (several occur on campus regularly each year)	Facilities Management and Human Resources	List of activities, with organization and contacts

B2-2
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Publicize existing local environmental/watershed groups	Facilities Management and Human Resources	Brochures available in existing rack locations

D. Stormwater Management Program Summary (Cont.)

B2-3
BMP ID #

Stormwater stencil day Specify Best Management Practice	Facilities Management and Human Resources Responsible Dept./Person Name	Stencil all drains on campus with appropriate language Specify Measurable Goal

B2-4
BMP ID #

Coordinate with town of Canton Specify Best Management Practice	Facilities Management and Compliance Officer Responsible Dept./Person Name	At least one face-to-face meeting with relevant municipal staff on stormwater issues Specify Measurable Goal

3. Illicit Discharge Detection and Elimination:

B3-1
BMP ID #

Compile maps and other info of existing stormwater systems Specify Best Management Practice	Facilities Management Responsible Dept./Person Name	Maps in both large format and standard handout size, showing storm drains, outfalls with outfalls numbered. Specify Measurable Goal

B3-2
BMP ID #

Develop written SOP defining and forbidding illicit connections Specify Best Management Practice	Facilities Management and Human Resources Responsible Dept./Person Name	One or more written SOPs in standard facility format Specify Measurable Goal

B3-3
BMP ID #

Survey of campus buildings for illegal connections Specify Best Management Practice	Facilities Management Responsible Dept./Person Name	All buildings checked Specify Measurable Goal

B3-4
BMP ID #

Repair of any illicit connections discovered (if any are found) Specify Best Management Practice	Facilities Management Responsible Dept./Person Name	Full sanitary/storm sewer separation Specify Measurable Goal

B3-5
BMP ID #

Survey of non-building areas for illicit connections and control of illegal dumping Specify Best Management Practice	Facilities Management Responsible Dept./Person Name	Full sanitary/storm sewer separation Specify Measurable Goal

JUL 31 2003
MUNICIPAL ASSISTANCE UNIT

D. Stormwater Management Program Summary (Cont.)

4. Construction Site Runoff Control:

B4-1
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Work with DCAM to develop contract language for new construction	Compliance Officer	Achieve workable contract language to effect stormwater construction control

B4-2
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Develop/implement training for employees who oversee construction activities	Human Resources and Facilities Management	Portion of training program discusses objectives for all relevant staff (See also B1-3)

B4-3
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Review with DCAM use of new contract language and related procedures	Compliance Officer and Facilities Management	Memorandum describing current use and potential changes

5. Post Construction Runoff Control: (See also B2-4, B4-1 and B4-3 above and B6-1 below)

B5-1
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Codify maintenance of storm drains and other control measures	Compliance Officer and Facilities Management	Written SOPs for procedures and frequency. May also involve use of state CAMIS computerized maintenance management system

6. Municipal Good Housekeeping:

B6-1
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Review relevant SOPs and work practices for stormwater management	Facilities Management	All work procedures with relevance to stormwater will be reviewed with changes made as applicable

D. Stormwater Management Program Summary (Cont.)

B6-2
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Review all relevant statewide and facility contracts for appropriate language conforming to facility good housekeeping practice (includes waste disposal, vehicle and landscaping contracts)	Facility Management, Contracting Department and Compliance Officer	All contracts with potential relevance to stormwater will be reviewed, and changes made as applicable

B6-3
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Discussion with town of Canton with potential to adopt some town BMPs	Compliance Officer	Meetings and review of documents, potential MOU or similar agreement.

B6-4
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Refine procedures to target disposal of horse/goat manure and waste from pet walking	Facility Management	New work procedures and facilities to target these activities and materials

B6-5
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Storm drain cleaning	Facilities Management	Targeted cleaning frequency to be determined

7. BMPs for Meeting TMDL: Not applicable.

BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal

BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal

BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal

BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal

BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal

E. 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.

Philip E. Doulo
Printed Name

Philip E. Doulo
Signature

7/22/03
Date

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

F. Storm Water Management Program TIME FRAMES

Transmittal Number W035181
Massachusettts Hpspital School
Facility ID (if known)
Page 1 of 1

	PERMIT YEAR ONE				PERMIT YEAR TWO				PERMIT YEAR THREE				PERMIT YEAR FOUR				PERMIT YEAR FIVE		
BMP ID #	Spring 03	Summer 03	Fall 03	Winter 03-04	Spring 04	Summer 04	Fall 04	Winter 04-05	Spring 05	Summer 05	Fall 05	Winter 05-06	Spring 06	Summer 06	Fall 06	Winter 06-07	Spring 07	Summer 07	Fall 07	Winter 07-08	Spring 08
B1-1							(distribution and revision continues until end of permit term)														
B1-2					(update each year)		X				X				X				X		
B1-3							(continuous use after development)														
B1-4											use begins in 05 and continues										
B1-5												X	(Earth day event)								
B2-1					(update every year)																
B2-2							(information remains available)														
B2-3						X	(may be repeated in permit year 5 if needed)														
B2-4				X			(meeting at least annually, time TBD)														
B3-1																					
B3-2																					
B3-3																					
B3-4																					
B3-5																					
B4-1																					
B4-2									(continuous use after development)												
B4-3																					
B5-1																					
B6-1																					
B6-2																					
B6-3						X			X												
B6-4																					
B6-5																					