DEPARTMENT OF THE ARMY
US ARMY SOLDIER SYSTEMS CENTER
KANSAS STREET
NATICK, MA 01760-5002

2004 MAY 17 P 2:51

MAR04 2008

Office of the Garrison Manager

Ms. Thelma Murphy
Regional Storm Water Coordinator
U.S. Environmental Protection Agency Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Dear Ms. Murphy,

Enclosed information is provided in order for you to process our storm water Application, (reference #MAR0442008).

You may contact Mr. Terence Garrahan, 508-233-5393, for additional information.

Sincerely,

Lionel E. Dubé
Garrison Manager

Note: Original to EPA
CF Mass DEP Watershed Management

SUBJECT: National Discharge Elimination System (NPDES) Permit Number: MAR042008)

2004 MAY 17 P 2:51

EPA Item #1 -- There is no BMP for determining available procedures and/or policies to control runoff from construction sites. If a procedure/policy or other mechanism already exists, please indicate that.

Facility Response: Construction projects are reviewed in accordance with Army Regulation 32 CFR 651 "Environmental Analysis of Army Actions; Final Rule, Federal Register; March 29, 2002" and the National Environmental Policy Act (NEPA). The Soldier Systems Center (SSC) Environmental, Safety and Health Office (ESHO) reviews Records of Environmental Considerations (RECs) and Environmental Assessments (EAs). An EA was completed for T-25 Storm Water Upgrade Project. Consultations were made the local conservation commission, including having members on site to observe outfalls. NEPA reviews require construction specifications to include sediment runoff controls such as but not limited to: hay bales, silt fences, siltation fabric curtains, sorbent booms, placed in appropriate locations. Proposed construction activities are reviewed to ensure that no adverse effects to ecological receptors: wetlands, protected species, and/or other biological resources.

EPA Item #2 -- There is no BMP for determining available procedures and/or policies to control post construction runoff from new development and redevelopment. If a procedure/policy or other mechanism already exists, please indicate that.

Facility Response: NEPA reviews are performed by ESHO to ensure that post-construction storm water run-offs are properly graded to channel surface runoff into catch basins located throughout the installation grounds and into subsurface drainage system. Surface water is physically treated in oil/water separators located throughout the installation, before discharging to Lake Cochituate. The installation's subsurface drainage system is equipped with eight oil/water separators (OWS). Petroleum, oil and lubricating oil (POL) drums are stored on spill containment pallets, or within a bermed area. Storage areas are inspected routinely. A Sorbent boom has been placed around the main outfall. Both the Spill Contingency Plan (SPC) and a Spill Prevention Control and Countermeasure Plan (SPCC) were updated during 2003. Spill supplies are available throughout the installation. A trained HAZMAT Team is available to respond to releases. Underground storage tank areas leak detection alarm systems; and corrosion protection systems: are inspected monthly by contract specialists.

EPA Item #3 -- There is no BMP for training of municipal employees.

Facility Response: All employees who handle hazardous substances are required to have annual refresher training. The next annual refresher training is scheduled for June 2004. Boiler plant personnel have received job specific training relative to Spill Prevention Control and Countermeasures (SPCC) Plan training which included oil delivery procedures for covering storm water drains when off-loading. HAZMAT Team personnel receive additional training and perform mock spills, which include laying down booms on parking lots and around outfalls, deploying a HAZMAT boat with boom materials to contain a spill should a release reach the lake.

EPA Item #4 -- Implementation Timeline for BMPs not provided.

Facility Response: A timeline was submitted to Mass DEP along with the NOI application. We will include a copy of that time-line with this letter.

EPA Item #5 -- Certification – Your title was not provided, as required. Please note that signature must be by a principal executive officer.

Facility Response: The original application signature line requested printed name, signature and date. Title was not part of the original signature block, nor did the BRP WM 08A certification statement mention that subject application needed to be signed by a principal executive office. Mr. Terence Garrahan, an Environmental Engineer assigned to our Environmental, Safety and Health Office, signed the original application. Mr. Garrahan coordinated the application preparation and submittal with the Directorate of Public Works. Mr. Lionel E. Dubé, Garrison Manager, has endorsed the original application and has delegated annual report submitting signature authority and other routine reporting requirements to the Director of Environmental, Safety and Health.

D. Stormwater Management Program Summary (cont.)

7. BMPs for Meeting TMDL:

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.

Terence Garrahan
Printed Name

Terence Garrahan
Signature

July 31, 2003
Date

LIONEL E. DUBE
Printed Name

Signature

5/15/07
Date

Title: Garrison Manager

DEPARTMENT OF THE ARMY
US ARMY SOLDIER SYSTEMS CENTER
KANSAS STREET
NATICK, MASSACHUSETTS 01760-5049

AMSSB-OES(N)

SUBJECT: Storm Water Management Reporting/Coordination Requirements

The Director of Environmental, Safety and Health Office shall have signature authority in accordance with 40 CFR 122.22 to sign annual storm water reports and related documentation.

LIONEL E. DUBÉ
Garrison Manager

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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 W 041046

Facility ID (if known)

Page ____ of ____

BMP ID #	PERMIT YEAR ONE				PERMIT YEAR TWO				PERMIT YEAR THREE				PERMIT YEAR FOUR				PERMIT YEAR FIVE				
	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	Next Permit
PE01					(re-stencil storm drains as needed)				(re-stencil storm drains as needed)				(re-stencil storm drains as needed)				(re-stencil storm drains as needed)				
PE02	(website postings as needed)																				
PE03	(website postings as needed)																				
PP01	X																				
PP02	(LCC meeting as required)																				
PP03		(annual training)				(annual training)				(annual training)				(annual training)				(annual training)			
ID01		X			(update maps as needed)				(update maps as needed)				(update maps as needed)				(update maps as needed)				
ID02		(on-going)				(on-going)				(on-going)				(on-going)				X			
ID03		(on-going)				(on-going)				(on-going)				(on-going)				(on-going)			
ID04		X																			
ID05	(on-going requirement)					(on-going)				(on-going)				(on-going)				(on-going)			
CS01																					
PC01		As needed																			
GH01	X				(Update as Needed)					(Update as Needed)				(Update as Needed)				(Update as Needed)			
GH02																					
GH03	(Annual OWS inspection)					(Annual OWS inspection)				(Annual OWS inspection)				(Annual OWS inspection)				(Annual OWS inspection)			
GH04	(Annual Street Sweep)				(Annual Street Sweep)				(Annual Street Sweep)				(Annual Street Sweep)				(Annual Street Sweep)				