Municipality/Organization: Northampton VA Medical Center

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NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2007)

Part I. General Information

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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: Mary A. Dowling

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Title: DIRECTOR

Date: April 24, 2007

Part II. Self-Assessment

In March 2005, the Veterans Administration (VA) issued a directive, which requires the Veterans Health Administration (VHA) and other VA Administrations and Staff Offices develop governing environmental policy and appropriate guidance for the development and implementation of Environmental Management Systems.

Subsequently the VHA implemented the Green Environmental Management System (GEMS) program, which provides a systematic framework for VA medical centers to manage their environmental "footprint," (i.e., the environmental impact associated with the operation of facilities and delivery of services). When implemented as part of the overall management system of a VA medical center, GEMS provide a set of processes and practices that enables a VA medical center to:

(1) Identify and address the impacts that the VA medical center's work has on the environment;

(2) Evaluate how environmental programs are managed;

(3) Ensure compliance with applicable environmental requirements;

(4) Determine opportunities for further and continual improvement;

(5) Manage environmental responsibilities in a proactive manner and pay greater attention to environmental regulatory responsibilities;

(6) Integrate its environmental program with organizational structure, responsibilities, facility planning activities, work practices and processes, organizational goals, operations, and resource allocation;

(7) Prevent pollution and conserve resources;

(8) Enhance its image with regulators, patients, the public, and stakeholder groups.

The systematic approach of GEMS allows VA medical centers to better focus on implementation and integration of environmental management programs and take a more inclusive and proactive view of environmental protection. The Northampton VA medical center (VAMC) has implemented a GEMS program under the direction of the GEMS Coordinator, Stephen Quigley. In April 2006, responsibility for the VAMC Stormwater Management Program (SWMP) was delegated to the GEMS Coordinator. During Permit Year 4, the focus of the VAMC SWMP has been evaluation of the implementation and effectiveness of Best Management Practices (BMPs) described in the VAMC Storm Water Management Plan. This Annual Report summarizes progress toward measurable goals and revision BMPs necessary to ensure complete implementation of the VAMC SWMP during Permit Year 5.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

Because the VAMC is a facility rather than a municipality, the definition of "public" has a much more limited scope. For the purpose of the SWMP, the term "public" has been interpreted as VAMC employees, patients, visitors, and on-site contractors. Educating the public about non-point source pollution and the functions of the storm drain system helps establish a facility-wide initiative to protect local surface waters.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
1.3.1	Public Education Materials	GEMS Coordinator	Develop a stormwater section for the Patient Handbook.	Evaluation of this BMP determined that the Patient Handbook was an ineffective vehicle to communicate stormwater awareness. The GEMS Coordinator worked with the Facilities Program Manager and other VAMC staff to identify more effective electronic and hard copy publications for public education and outreach. Information was posted on the intranet webpage and communicated to the patients and visitors in the *Bear Mountain Newsletter.*	• Continue to issue periodic updates to the community through both electronic and hard copy media. • Distribute one page stormwater brochure to employees, patients and visitors during the 2007 Infomatix Expo. • Distribute one page stormwater brochure to on-site contractors through Contract Procurement Department.
Revised			Communicate stormwater awareness to VAMC employees through electronic publications on the intranet webpage and the VISTA email system. Communicate stormwater awareness to patients, visitors, and on-site contractors through hard copy publications distributed at the Infomatix Expo and in the *Bear Mountain Newsletter.*		
1.3.2	Training Programs	GEMS Coordinator	Stormwater awareness topics have been incorporated into annual Oil SPCC training for VAMC employees.	Presentation of stormwater topics in conjunction with required annual spill prevention and safety training has been very effective in raising awareness about illicit discharges but has not addressed other BMPs. During Permit Year 4 the GEMS Coordinator has worked with an outside contractor to develop a comprehensive SWMP training program.	• Presentation of the comprehensive SWMP training incorporating the revised BMPs and lessons learned.
Revised					

1.3.2	Storm Drain Identification Program	GEMS Coordinator	Identify and mark all stormwater catch basins in the VAMC MS4.	During Permit Years 1 and 2 the VAMC implemented a storm drain identification program. This program consisted of developing an up-to-date map of the facility storm water drainage system; identifying and numbering all catch basins and outfalls on-site; and attaching stainless steel markers to each structure that read "No Dumping, Drains to River." During Permit Years 3 and 4 the VAMC has continued to update the drainage system map and identify markers that were damaged or removed by winter road maintenance activities.	• Replacement of damaged or removed markers.
Revised					

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
2.3.1	Annual "Clean the Stream" Program	Not Assigned	Volunteers help clean and maintain the stormwater collection system.	The VAMC had anticipated recruiting volunteers to help the VAMC to "Clean the Stream" on an annual basis. This would be an annual one day event to raise awareness by coordinating volunteers to walk the facility outfalls and ponds to remove debris, and raise awareness about the impact of facility operations on the surrounding environment. Volunteer turnout for the event during Permit Year 1 was very poor and due to ongoing maintenance and upkeep by the Grounds Department, there was very little debris to remove. Evaluation of this BMP in Permit Year 2 determined that it offers minimal benefit to the overall implementation and it has been discontinued.	•
Revised					
2.3.2	Partner/Support the City of Northampton	GEMS Coordinator	Establish and maintain communication with the City of Northampton Stormwater Program Coordinator.	During Permit Year 4 the VAMC continued to maintain regular communication with Mr. Douglas McDonald, Stormwater Coordinator for the city of Northampton Masschusetts.	• Maintain and broaden the inter-municipal relationship between the VAMC and the City of Northampton.
Revised					
2.3.3	Call Center/Suggestion Box	GEMS Coordinator	Set up a designated telephone extension with a voice mailbox.	The GEMS Coordinator is the designated individual responsible for implementation of the SWMP. As indicated on the intranet webpage, interested parties may communicate their suggestions, ideas, or observations directly to the GEMS Coordinator.	• Contact information for the GEMS Coordinator will be included in the one-page storm water brochure that will be distributed during the 2007 Informatix Expo and at the comprehensive SWMP training.
Revised					

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
3.4.1	Storm Drain Map	Facilities Management Program	Comprehensive AutoCAD map of the drainage system identifying all drainage structures, connections, and outfalls	The map of the facility storm water drainage system developed during Permit Year 1 for the Storm Drain Identification Program has been updated as changes occur.	• Continue to update and maintain the map of the drainage system.
Revised					
3.4.2	Stormwater Policy	GEMS Coordinator	Implement a VAMC policy that describes potential non-stormwater discharges and prohibitions.	The VAMC stormwater policy was issued during Permit Year 2. Evaluation of this BMP has determined that the existing policy lacks specific prohibitions and delegation of roles and responsibilities. During Permit Year 4, responsibility for the revision and communication of the policy was delegated to the GEMS Coordinator.	• The GEMS Coordinator will revise the policy and communicate the changes through the Public Education and Outreach Training Programs. • The GEMS Coordinator will be responsible for enforcing the policy.
Revised					
3.4.3	Illicit Discharge Detection Program	GEMS Coordinator / Facilities Management Program	Conduct quarterly compliance inspections of the system outfalls to identify possible cross connections through dry weather flow.	During Permit Year 4 inspections were not performed on a regular basis and were not documented. Responsibility for developing inspection checklists and an inspection schedule was delegated to the GEMS Coordinator.	• The GEMS Coordinator will develop inspection checklists and train FMS personnel on observation of dry weather flow. • The GEMS Coordinator will be responsible scheduling inspections, maintaining documentation, and evaluating the effectiveness of the program.
Revised					
3.4.4	Illicit Discharge Elimination Program	GEMS Coordinator / Facilities Management Program	When illicit discharges are detected the VAMC will work to quickly correct the problem.	No illicit discharges were detected.	• Investigate and correct any potential illicit discharges identified through quarterly inspections.
Revised					

3.4.5	Education Program	GEMS Coordinator	Educate VAMC employees, patients, visitors, and on-site contractors about preventing and eliminating illicit discharges.	During Permit Year 4 the GEMS Coordinator has worked with an outside contractor to develop a comprehensive SWMP training program that will include information about illicit discharges.	• Presentation of the comprehensive SWMP training incorporating the revised BMPs and lessons learned.
Revised					

4. Construction Site Stormwater Runoff Control

All construction activities (including other land-disturbing activities) at the VAMC are contracted through the Facilities Management Program. Specifications for construction site stormwater runoff control through erosion and sedimentation control techniques are incorporated directly into construction contracts.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
4.2.1	Regulatory Controls	Facilities Management Program	Erosion and sediment control specifications.	Erosion and sedimentation control techniques were incorporated into the construction contract for the Steam Line Project.	• All construction projects, regardless of total land disturbance, will be required to implement erosion and sedimentation control techniques.
Revised					
4.2.2	Review and Site Inspection Procedures	GEMS Coordinator	Periodic inspections of erosion and sediment control structures during construction projects.	The GEMS Coordinator performed informal inspections of the silt fences and hay bales implemented for the Steam Line Project. These inspections detected one failure, which was immediately corrected.	• The GEMS Coordinator will develop inspection checklists and an inspection schedule for active construction projects at the VAMC.
Revised					
4.2.3	Enforcement Procedures	GEMS Coordinator / Facilities Management Program	Contractor accountability and immediate correction of inadequate erosion and sediment control structures	Enforcement of contract specifications through Facilities Management Program Director and the VAMC Contracting Officer.	• Continued enforcement.
Revised					
4.2.4	Procedures for Handling Public Comment	GEMS Coordinator / Facilities Management Program	Set up a designated telephone extension with a voice mailbox.	The GEMS Coordinator is the designated individual responsible for implementation of the SWMP. As indicated on the intranet webpage, interested parties may communicate their suggestions, ideas, or observations directly to the GEMS Coordinator.	• Contact information for the GEMS Coordinator will be included in the one-page storm water brochure that will be distributed during the 2007 Informatix Expo and at the comprehensive SWMP training.
Revised					

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

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
5.3.1	Structural Stormwater Controls	GEMS Coordinator / Facilities Management Program	Identify structural controls in design documents and contract specifications	During Permit Years 1, 2, 3, and 4 the VAMC has not conducted any construction projects disturbing land greater than one acre and post structural stormwater controls have not been necessary.	• Evaluate all proposed construction projects for potential implementation of structural controls in design documents and contract specifications.
Revised					
5.3.2	Stormwater Policy	GEMS Coordinator	Stormwater policy should focus on preserving surface waster quality.	The VAMC stormwater policy was issued during Permit Year 2. Evaluation of this BMP has determined that the existing policy lacks specific prohibitions and delegation of roles and responsibilities. During Permit Year 4, responsibility for the revision and communication of the policy was delegated to the GEMS Coordinator.	• The GEMS Coordinator will revise the policy and communicate the changes through the Public Education and Outreach Training Programs. • The GEMS Coordinator will be responsible for enforcing the policy.
Revised					
5.3.3	Planning Strategies	GEMS Coordinator / Facilities Management Program	Develop planning strategies that focus on avoiding sensitive areas for development.	During Permit Years 1, 2, 3, and 4 the VAMC has not conducted any construction projects disturbing land greater than one acre and post structural stormwater controls have not been necessary.	• Evaluate all proposed construction projects for potential impact to sensitive areas of the facility.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 5
6.3.1	Employee Training Program	GEMS Coordinator	Stormwater awareness topics have been incorporated into annual Oil SPCC training for VAMC employees.	Presentation of stormwater topics in conjunction with required annual spill prevention and safety training has been very effective in raising awareness about illicit discharges but has not addressed other BMPs. During Permit Year 4 the GEMS Coordinator has worked with an outside contractor to develop a comprehensive SWMP training program.	• Presentation of the comprehensive SWMP training incorporating the revised BMPs and lessons learned.
Revised					
6.3.2	Waste Oil Recycling	Grounds Department	Provide a designated collection area for proper management and disposal of waste oil generated at VAMC.	Waste oil generated throughout the VAMC is collected, managed, and recycled in accordance with the procedures set forth in the Oil SPCC Plan.	• Maintain program.
Revised					
6.3.3	Catch Basin Cleaning Program	Grounds Department	Reduce the frequency of catch basin cleaning.	During Permit Years 3 and 4 the VAMC has significantly reduced the amount of sand used during winter road maintenance. This has been documented through procurement invoices. The result has been a reduction of sediment accumulating in facility catch basins and a subsequent reduction in the frequency of cleaning.	• Maintain program and document the results through an inspection program designed by the GEMS Coordinator and implemented by the Grounds Department.
Revised					
6.3.4	Street Sweeping Program	Grounds Department	Schedule street sweeping based on priority areas.	During Permit Years 3 and 4 the VAMC has significantly reduced the amount of sand used during winter road maintenance. This has resulted in a reduction of priority areas and the ability to maintain the system through a single annual facility-wide street sweeping program.	• Maintain program and document the results through an inspection program designed by the GEMS Coordinator and implemented by the Grounds Department.
Revised					