

**Municipality/Organization:** Northampton VA Medical Center

**EPA NPDES Permit Number:** MAR042026

**MassDEP Transmittal Number:** W-041170

**Annual Report Number**

**& Reporting Period:** April 1, 2007 – March 31, 2008

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**NPDES PII Small MS4 General Permit  
Annual Report  
(Due: May 1, 2008)**

**Part I. General Information**

**Contact Person:** James A. McPherson

**Title:** Facilities Program Manager

**Telephone #:** (413) 582-3014

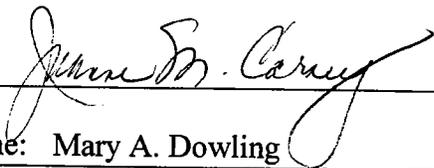
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**Certification:**

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:**



**Printed Name:** Mary A. Dowling

**Title:** Director

**Date:** April 9, 2008

## **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 5 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 6
1.3.1 Revised	Public Education Materials	GEMS Coordinator	Develop a stormwater section for the Patient Handbook. 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 <i>Bear Mountain Newsletter</i> .	Review of Stormwater topics presented to staff, visitors and other stakeholders during Year 5 showed needed improvement in communication of comprehensive stormwater brochure to on-site contractors.	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 2008 Infomatix Expo.  Distribute one page stormwater brochure to on-site contractors through Contract Procurement Department document by the GEMS Program.
1.3.2 Revised	Training Programs	GEMS Coordinator	Stormwater awareness topics have been incorporated into annual Oil SPCC training for VAMC employees. Present comprehensive stormwater training in addition to incorporation of stormwater awareness topics in other environmental program trainings.	Presentation of comprehensive stormwater training that includes assessment of BMPs and lessons learned was effective in raising awareness in regards to preventing and eliminating illicit discharges.	Continue with annual presentation of comprehensive SWMP training incorporating BMPs and lessons learned.

1.3.2	Storm Drain Identification Program	GEMS Coordinator	Identify and mark all stormwater catch basins in the VAMC MS4.	Comprehensive inspection of catch basins at the end of Year 5 identified some catch basins with missing "No Dumping, Drains to River" medallions due to snow removal activities.	Continue with replacement of damaged or removed markers. Continue with update of the VAMC drainage system map.
Revised					

## 2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 5 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 6
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 5 VAMC continued to maintain regular communication with Mr. Douglas McDonald, Stormwater Coordinator with the city of Northampton.	Continue to 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.	During Report Year 5 VAMC Stormwater brochure developed for the 2007 Informatics Expo contained Stormwater contact information. Stormwater contact info also communicated to employees on VAMC intranet and in emails to all employees.	Continue to inform employees and the public about VAMC designated telephone extension with voice mailbox for receiving stormwater related concerns or questions.
Revised					

### 3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 5 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 6
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's stormwater drainage system developed during Permit Year 1 showed no changes to the drainage structures, connections and outfalls during Permit Year 5.	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.	During Report Year 5 VAMC continued review of original stormwater policy that was issued during Permit Year 2 with the intent of publishing a comprehensive stormwater management program policy that addresses all stormwater requirements to include but not limited to: specific prohibitions, delegation of roles and responsibilities, communication and training, contractor roles and responsibilities, enforcement, consequences of non-compliance.	Publish revised comprehensive VAMC Stormwater policy and communicate policy to employees, visitors and other stakeholders as appropriate.
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 5 documentation of catch basin and outfall inspections showed no illicit discharges. Documentation, however, does not support inspections as having occurred on a quarterly basis.	Revise catch basin and outfall inspection forms to reflect quarterly compliance inspections.  Continue to train personnel performing the inspections on illicit discharge flows in dry and wet weather conditions.  Review and revise VAMC Stormwater policy for inclusion of quarterly compliance inspections for detecting illicit discharges.
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 were detected during Permit Year 5.	Continue to monitor for illicit discharges with timely address of identified discharges.
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 5, GEMS Coordinator presented comprehensive stormwater management training to all Facilities Management employees at the VAMC. Training included information about illicit discharges.	Continue to present comprehensive SWMP training incorporating the revised BMPs and lessons learned to employees who work at or near catch basins and outfalls.
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 5 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 6
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.	Continue with inclusion of sedimentation control techniques in construction, demolition and renovation projects, regardless of total land disturbance.
Revised					
4.2.2	Review and Site Inspection Procedures	GEMS Coordinator	Periodic inspections of erosion and sediment control structures during construction projects.	While informal inspections for construction site(s) occurred during Year 5, review of this BMP showed improvements needed particularly in the area of formal documentation of site inspections.	VAMC Stormwater policy to be reviewed and revised as necessary to require documentation of site inspections for erosion and sediment runoff from construction activities.
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.	Continue with publishing of information informing employees, visitors and other stakeholders of facility stormwater contact person and how to report stormwater related questions and concerns to the VAMC.
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 thru 5 VAMC has not conducted any construction projects disturbing land greater than one acre and post structural stormwater controls have not been necessary.	Continue to 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 water 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.	Continue with review and revision of VAMC Stormwater policy with the goal of publishing revised Stormwater policy in Year 6.
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 thru 5 VAMC has not conducted any construction projects disturbing land greater than one acre and post structural stormwater controls have not been necessary.	Continue with evaluation of 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 5 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 6
6.3.1	Employee Training Program	GEMS Coordinator	Stormwater awareness topics have been incorporated into a comprehensive Stormwater Management Training for those employees who work at or near stormwater catch basins and outfalls.	Presentation of stormwater training in conjunction with required annual spill prevention and safety training has been very effective in raising awareness about illicit discharges. During Permit Year 5 GEMS Coordinator gave training on comprehensive stormwater that included review and assessment of all BMPs.	Continue with presentation of comprehensive SWMP training incorporating assessment of BMPs and lessons learned.
Revised					
6.3.2	Waste Oil Recycling	Grounds Department	Provide designated collection areas for proper management and disposal of waste oil and used cooking oil generated at VAMC.	Waste oil and used cooking oil that is generated throughout the VAMC is collected, managed, and recycled. Waste oil that is not recycled is stored, managed and disposed of as hazardous waste.	Continue to maintain program and monitor program to ensure oil enters VAMC catch basins or outfalls.
Revised					
6.3.3	Catch Basin Cleaning Program	Grounds Department	Reduce the frequency of catch basin cleaning.	While frequency of catch basin cleaning had been reduced in Years 3 and 4 because of reduction of sediment Year 5 showed some catch basins in need of cleaning. Because of this, VAMC will contract in Year 6 to have all catch basins and outfalls professional inspected and cleaned by third party contract.	Implement contract to have all catch basins and outfalls inspected by third party with such contract requiring catch basins and outfalls to be professionally cleaned as needed. Also contractor to identify all catch basins and outfalls in need of repair with minor repairs to be performed by VAMC grounds personnel and major repairs (if any) to be performed by third party contract.
Revised					

6.3.4	Street Sweeping Program	Grounds Department	Schedule street sweeping based on priority areas.	<p>During Permit Years 3 thru 5 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 with additional street sweepings subject to intense weather conditions causing increase debris on VAMC roadways. While street sweepings are documented via VAMC "work orders" Year 5 has shown retrieval of street sweeping documents to be problematic.</p>	<p>Continue to maintain Street Sweeping program and document the results.</p>
Revised					



**DEPARTMENT OF VETERANS AFFAIRS**  
**Northampton VA Medical Center**  
**Leeds, MA 01053-9764**

**In Reply Refer to: 631/ 00**

April 9, 2008

Ann Herrick - CIP  
U.S. Environmental Protection Agency – Region 1  
1 Congress Street, Suite 1100  
Boston, MA 02114-2023

Dear Ms. Herrick:

Enclosed please find Year 5 Stormwater Management Plan from Northampton VA Medical Center covering the period April 1, 2007 – March 31, 2008.

If you have any questions regarding this report, please contact James A. McPherson, Facilities Manager at (413) 582-3014.

  
MARY A. DOWLING  
DIRECTOR