

Veterans Affairs Medical Center (VAMC)
1970 Roanoke Blvd
Salem, Virginia 24153

MS4 Program Plan



VSMP General Permit Registration Statement for Stormwater Discharges
from Small Municipal Separate Storm Sewer Systems (MS4)

Permit Number: VAR040050

Updated: August 10, 2016

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Chief, Safety Service

The Salem VAMC has established minimum control measures identified as Best Management Practices that will be implemented as part of the MS4 program requirements.

Minimum Control Measure #1 Public Education and Outreach on Stormwater Impacts

Section II.B.1.c. – The updated program shall be designed to: (1) Identify, at a minimum, three high priority water quality issues, that contribute to the discharge of stormwater (e.g., Chesapeake Bay nutrients, pet wastes and local bacteria TMDLs, high-quality receiving waters, and illicit discharges from commercial sites) and a rationale for the selection of the three high-priority water quality issues; (2) Identify and estimate the population size of the target audience or audiences who is most likely to have significant impacts for each high-priority water quality issue; (3) Develop relevant message or messages and associated educational and outreach materials (e.g., various media such as printed materials, billboard and mass transit advertisements, signage at select locations, radio advertisements, television advertisements, websites, and social media) for message distribution to the selected target audiences while considering the viewpoints and concerns of the target audiences including minorities, disadvantaged audiences, and minors; (4) Provide for public participation during public education and outreach program development; (5) Annually conduct sufficient education and outreach activities designed to reach an equivalent 20% of each high-priority issue target audience. It shall not be considered noncompliance for failure to reach 20% of the target audience. However, it shall be a compliance issue if insufficient effort is made to annually reach a minimum of 20% of the target audience; and (6) Provide for the adjustment of target audiences and messages including educational materials and delivery mechanisms to reach target audiences in order to address any observed weaknesses or shortcomings.

BMP 1A – The Salem VAMC has developed brochures and informational articles to inform its employees, contractors, and veterans of the high priority water quality issues. These materials are distributed and are available to all employees through the Facility intranet page. The Green Environmental Management System (GEMS) Coordinator attends construction project design meeting to inform contractors of their responsibilities under the MS4 program.

The Salem VAMC has identified three high priority water quality issues that may contribute to pollution from runoff at the medical center.

1. Used material storage – The Salem VAMC has several areas where used materials are stored. The materials include; equipment that will be sold or transferred to another owner; material that will be recycled; and containers that will be returned to the vendors. The Heating, Ventilating, and Air-Conditioning (HVAC) Shop stores equipment beside their shop as the equipment is prepared for disposal. Disposal is defined as shipment to a solid waste facility, shipment to a recycling facility, or transfer to another owner as part

through General Services Administration (GSA). The Boiler Plant stores empty drums outside its building before they are returned to the vendor. The used materials that sit on the paved areas of the facility can add sediment, debris, and oil to the stormwater system during rain events. Approximately thirty five (35) employees in Facilities Management Service (FMS) have the most significant impact on the high priority water quality issue. Used materials will be stored out of the weather when possible. When this is not possible, Safety Service will monitor the storage areas monthly to ensure sediment, debris, or oil are not added to the stormwater system.

2. Runoff from the Greenhouse – The Salem VAMC maintains a greenhouse as part of therapy programs for patients and is open year-round to the public. The Greenhouse uses hoses and sprinklers to water the plants before they are sold. The runoff from the Greenhouse can pick up soil from the facility and soil used in the Greenhouse which can increase benthic sediment. Approximately fifteen (15) employees and patients who work in the Greenhouse have the most significant impact on the high priority water quality issue. This preventive measure reduces the amount of sediment discharged through the stormwater sewer system. Sediment levels are measured during rainfall events as part of the total maximum daily load (TMDL) Action Plan.

3. Reduce introduction of sediment, liquids, and waste to storm water system – The Salem VAMC has numerous at road curb cuts and drop inlets for the collection of rainwater into the storm water system. The Salem VAMC will attach signage to the curb cuts and drop inlets warning individuals not to dispose of sediments, liquids, and wastes into the storm water system. The same warning is included in the information pamphlet for the Salem VAMC storm water system. The preventive measure will decrease the amount of sediment and pollutants introduced into the storm water system.

BMP 1B – The Salem VAMC includes stormwater issues as part of its quarterly GEMS Committee under the environmental compliance recurring report. The minutes are made available to employees through the public server. The MS4 Program Plan is available to all Salem VAMC employees through the Safety Service SharePoint which is linked to the Facility's intranet page.

BMP 1C – The Salem VAMC has implemented a program to identify all stormwater drains with metal tags. These tags instruct the public to avoid pouring contaminants into the drains.

Minimum Control Measure #2 Public Involvement and Participation

Section II.B.2.a. - Public involvement. (1) The operator shall comply with any applicable federal, state, and local public notice requirements. (2) The operator shall: (a) Maintain an updated MS4 Program Plan. Any required updates to the MS4 Program Plan shall be completed at a minimum of once a year and shall be updated in conjunction with the annual report. The operator shall post copies of each MS4 program plan on its webpage at a minimum of once a year and within 30 days of submittal of the annual report to the department. (b) Post copies of each annual report on the operator's web page within 30 days of submittal to the department and retain copies of annual reports online for the duration of this state permit; and (c) Prior to applying for coverage as required by Section III M, notify the public and provide for receipt of comment of the proposed MS4 Program Plan that will be submitted with the registration statement. As part of the reapplication, the operator shall address how it considered the comments received in the development of its MS4 Program Plan. The operator shall give public notice by a method reasonably calculated to give actual notice of the action in question to the persons potentially affected by it, including press releases or any other forum or medium to solicit public participation.

Section II.B.2.b. - Public participation. The operator shall participate, through promotion, sponsorship, or other involvement, in a minimum of four local activities annually e.g., stream cleanups; hazardous waste cleanup days; and meetings with watershed associations, environmental advisory committees, and other environmental organizations that operate within proximity to the operator's small MS4. The activities shall be aimed at increasing public participation to reduce stormwater pollutant loads; improve water quality; and support local restoration and clean-up projects, programs, groups, meetings, or other opportunities for public involvement.

Section II.B.2.c. - The MS4 Program Plan shall include written procedures for implementing this program.

Salem VAMC Procedures.

Environmental Pride Day – Environmental Pride Day is an annual event aimed at reducing the medical center's impact on the environment. One of the activities involves conducting general cleanup of debris that may be blocking storm drains and removing unserviceable equipment that may have oils and greases that could leak into the stormwater system. The Environmental Pride is organized by Logistics Service who manages the disposition of all used equipment. Any equipment that cannot be disposed through General Service Administration (GSA) will be recycled or disposed as solid waste. Multiple emails are sent out as an all employee email message reminding them of Environmental Pride Day. The old equipment is given directly to Logistics for disposal.

Information Booth – An information booth will be organized and staffed by the GEMS Coordinator for Earth Day each year. The booth will be placed in area to maximize foot traffic, such as the lobby of Building 143, and last at least 3 hours. The goal of the booth will be to educate staff, patients, and visitors on the environmental programs at the Salem VAMC to include the stormwater system, high priority water quality issues, and the MS4 Program Plan. An information pamphlet discussing the high priority water quality issues will be distributed.

Virginia Stormwater Conference – The GEMS Coordinator will attend the annual stormwater conference held by the Virginia Water Environment Association. This conference allows the GEMS Coordinator, who manages the MS4 Program for the Salem VAMC, to network with other MS4 Program Managers from throughout the state.

Promote Roanoke River Clean-up Events – The Salem VAMC will promote clean-up events arranged by Roanoke Parks and Recreation and Roanoke River Blueway. The events organized through these community organizations will be advertised as all employee email messages, included on the Facility Intranet Page under “Salem News” and included on the Safety Service SharePoint Site.

GEMS Committee – The Salem VAMC has the Green Environmental Management Systems (GEMS) Committee for public participation. This is a multi-disciplinary committee chaired by the Associate Director with 18 members and is tasked with oversight for all environmental programs including storm water management and pollution prevention. Each meeting has an open forum session and a session to discuss any ethical, patient safety, or employee safety concerns. Any Salem VAMC employee has the right to bring any concern to the committee during these sessions. The minutes from the GEMS Committee are posted on the Safety Service SharePoint so all employees can access them.

Pharmaceutical Disposal Services for Patients – The Salem VAMC has installed a service which collects unused pharmaceuticals from patients. The service consists of a locked collection container where the patient disposes of the unused pharmaceutical. The container is located adjacent to the outpatient pharmacy window where patients receive their pharmaceuticals. When the container is full, the bag is removed, secured, and returned to the company for safe disposal. The bags are numbered and tracked to ensure the pharmaceutical wastes are not diverted from proper disposal. Any patient or visitor can use this disposal program. This program helps prevent the introduction of pharmaceuticals to the public waterways.

**Minimum Control Measure #3
Illicit Discharge Detection and Elimination**

Section II.B.3.a. - The operator shall maintain an accurate storm sewer system map and information table and shall update it in accordance with the schedule set out in Table 1 of this section. (1) The storm sewer system map must show the following, at a minimum: (a) The location of all MS4 outfalls. In cases where the outfall is located outside of the MS4 operator's legal responsibility, the operator may elect to map the known point of discharge location closest to the actual outfall. Each mapped outfall must be given a unique identifier, which must be noted on the map; and (b) The name and location of all waters receiving discharges from the MS4 outfalls and the associated HUC. (2) The associated information table shall include for each outfall the following: (a) The unique identifier; (b) The estimated MS4 acreage served; (c) The name of the receiving surface water and indication as to whether the receiving water is listed as impaired in the Virginia 2010 303(d)/305(b) Water Quality Assessment Integrated Report; and (d) The name of any applicable TMDL or TMDLs. (3) Within 48 months of coverage under this state permit, the operator shall have a complete and updated storm sewer system map and information table that includes all MS4 outfalls located within the boundaries identified as "urbanized" areas in the 2010 Decennial Census and shall submit the updated information table as an appendix to the annual report. (4) The operator shall maintain a copy of the current storm sewer system map and outfall information table for review upon request by the public or by the department. (5) The operator shall continue to identify other points of discharge. The operator shall notify in writing the downstream MS4 of any known physical interconnection.

Salem VAMC Procedures.

The following table is a list of stormwater system outfalls for the Salem VAMC. The table contains: the identifier used on the stormwater system map; brief location description; whether the outfall is on-site or off-site; approximate acreage served; the receiving waters for the off-site outfall; and applicable TMDLs as listed in the MS4 permit.

Table 1. Salem VAMC Stormwater Outfalls

Identifier	Location	On-site / Off-site	Acreage Served	Receiving Waters	Applicable TMDLs
1	West of Building 116	On-site	2	N/A (On-site outfall)	Sediment / Bacteria
2	East of Building 116	On-site	<1	N/A (On-site outfall)	Sediment / Bacteria
3	30 inch pipe at bottom of road near Building 116	On-site	5	N/A (On-site outfall)	Sediment

Identifier	Location	On-site / Off-site	Acreage Served	Receiving Waters	Applicable TMDLs
4	4 inch pipe alongside road near Building 116	On-site	<1	N/A (On-site outfall)	Sediment / Bacteria
5	Dual 10 inch pipes located in woods	On-site	50	N/A (On-site outfall)	Sediment / Bacteria
6	Outfall located at top of rock channel	On-site	5	N/A (On-site outfall)	Sediment
7	Outfall located at bottom of rock channel	On-site	20	N/A (On-site outfall)	Sediment
8	Outfall on west end of road from Salem VAMC to Virginia Veterans Care center	On-site	5	N/A (On-site outfall)	Sediment / Bacteria
9	Outfall on east end of road from Salem VAMC to Virginia Veterans Care center	On-site	5	N/A (On-site outfall)	Sediment / Bacteria

Section II.B.3.b. - The operator shall effectively prohibit, through ordinance or other legal mechanism, non-stormwater discharges into the storm sewer system to the extent allowable under federal, state, or local law, regulation, or ordinance. Categories of non-stormwater discharges or flows (i.e., illicit discharges) identified in 4VAC50-60-400 D 2 c (3) must be addressed only if they are identified by the operator as significant contributors of pollutants to the small MS4. Flows that have been identified in writing by the Department of Environmental Quality as de minimis discharges are not significant sources of pollutants to surface water and do not require a VPDES permit.

Section II.B.3.c. - The operator shall develop, implement, and update, when appropriate, written procedures to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the small MS4. These procedures shall include: (1) Written dry weather field screening methodologies to detect and eliminate illicit discharges to the MS4 that include field observations and field screening monitoring and that provide: (a) A prioritized schedule of field screening activities determined by the operator based on such criteria as age of the infrastructure, land use, historical illegal discharges, dumping or cross connections. (b) The minimum number of field screening activities the operator shall complete annually to be determined as follows: (i) if the total number of outfalls in the small MS4 is less than 50, all outfalls

shall be screened annually or (ii) if the small MS4 has 50 or more total outfalls, a minimum of 50 outfalls shall be screened annually. (c) Methodologies to collect the general information such as time since the last rain, the quantity of the last rain, site descriptions (e.g., conveyance type and dominant watershed land uses), estimated discharge rate (e.g., width of water surface, approximate depth of water, approximate flow velocity, and flow rate), and visual observations (e.g., order, color, clarity, floatables, deposits or stains, vegetation condition, structural condition, and biology); (d) A time frame upon which to conduct an investigation or investigations to identify and locate the source of any observed continuous or intermittent non-stormwater discharge prioritized as follows: (i) illicit discharges suspected of being sanitary sewage or significantly contaminated must be investigated first and (ii) investigations of illicit discharges suspected of being less hazardous to human health and safety such as noncontact cooling water or wash water may be delayed until after all suspected sanitary sewage or significantly contaminated discharges have been investigated, eliminated, or identified. Discharges authorized under a separate VPDES or state permit require no further action under this permit. (e) Methodologies to determine the source of all illicit discharges shall be conducted. If an illicit discharge is found, but within six months of the beginning of the investigation neither the source nor the same non-stormwater discharge has been identified, then the operator shall document such in accordance with Section II B 3 f. If the observed discharge is intermittent, the operator must document that a minimum of three separate investigations were made in an attempt to observe the discharge when it was flowing. If these attempts are unsuccessful, the operator shall document such in accordance with Section II B 3 f. (f) Mechanisms to eliminate identified sources of illicit discharges including a description of the policies and procedures for when and how to use legal authorities; (g) Methods for conducting a follow-up investigation in order to verify that the discharge has been eliminated. (h) A mechanism to track all investigations to document: (i) the date or dates that the illicit discharge was observed and reported; (ii) the results of the investigation; (iii) any follow-up to the investigation; (iv) resolution of the investigation; and (v) the date that the investigation was closed.

Salem VAMC Procedures.

All outfalls will be checked quarterly for illicit discharges and documented on the form included in Table 2. The outfalls will be checked no earlier than 48 hours after the last rain event exceeding 0.1 inches of rain. Outfall numbers 3, 6, 7, 8, and 9 will be the first checked for illicit discharges as these five (5) outfalls are fed by publically accessible storm water drains. Each outfall will be visually checked for the following: visible flow; clarity of the flow; presence of oil sheen; any solids; color of flow; any odors from the flow; and any other obvious signs of discharge. National Weather Service data will be used to determine if there was rainfall exceeding 0.1 inches in the past 48 hours. If an illicit discharge is observed, the GEMS Coordinator will investigate the source of the discharge within 24 hours of detection. Any discharged believed to be sanitary sewage will be prioritized and immediately investigated. Spills are reported by using the procedures established in the facility Spill Prevention Control and Countermeasures Plan.

Each illicit discharge shall be documented on the form below to include source of the discharge. The form shall be presented to the GEMS Committee, which is chaired by the Associate Director, for tracking and to determine what corrective actions are needed. The GEMS Committee shall determine how to eliminate any identified sources of illicit discharges based on the recommendations of the GEMS Coordinator. If the source of the illicit discharge cannot be determined within 6 months of beginning the investigation, the Salem VAMC shall document such in accordance with Section II B 3 f of the permit and present to the GEMS Committee. When the illicit discharge is intermittent, the Salem VAMC shall make three (3) separate investigations to determine the source. If the source of the intermittent illicit discharge cannot be determined after the three (3) investigations, the Salem VAMC shall document such in accordance with Section II B 3 f of the permit and present to the GEMS Committee. The use of legal authorities will be the decision of the Associate Director based on the recommendations of the GEMS Committee.

Once a control method for an illicit discharge is implemented, the GEMS Coordinator will conduct a visual inspection of the previously impacted outfall within 30 days of completion of the control method unless rainfall prevents the visual inspection. Then the visual inspection will occur at first opportunity following 48 hours after the last rain event exceeding 0.1 inches of rain.

Illicit Discharge Detection Form

Name: _____ Title: _____

Date: _____ <0.1 inches of rain in past 48 hrs – Yes _____ No _____

Outfall #	Drainage Point type	Dry-weather flow	Clarity	Oil sheen	Solids (floating, settled, or suspended)	Color	Odor	Other obvious indicators of pollution

Source of Illicit Discharge and Corrective Action (list one for each discharge noted above):

Section II.B.3.d. - The operator shall promote, publicize, and facilitate public reporting of illicit discharges into or from MS4s. The operator shall conduct inspections in response to complaints and follow-up inspections as needed to ensure that corrective measures have been implemented by the responsible party.

Salem VAMC Procedures.

All illicit discharge investigation will be presented to the GEMS Committee and included in the committee minutes which are available to all Salem VAMC employees.

Minimum Control Measure #4 Construction Site Stormwater Runoff Control

Section II.B.4.a. - Applicable oversight requirements. The operator shall utilize its legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to address discharges entering the MS4 from the following land-disturbing activities: (1) Land-disturbing activities as defined in § 10.1-560 of the Code of Virginia that result in the disturbance of 10,000 square feet or greater; (2) Land-disturbing activities in Tidewater jurisdictions, as defined in § 10.1-2101 of the Code of Virginia, that disturb 2,500 square feet or greater and are located in areas designated as Resource Protection Areas (RPA), Resource Management Areas (RMA) or Intensely Developed Acres (IDA), pursuant to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act; (3) Land-disturbing activities disturbing less than the minimum land disturbance identified in subdivision (1) or (2) above for which a local ordinance requires that an erosion and sediment control plan be developed; and (4) Land-disturbing activities on individual residential lots or sections of residential developments being developed by different property owners and where the total land disturbance of the residential development is 10,000 square feet or greater. The operator may utilize an agreement in lieu of a plan as provided in § 10.1-563 of the Code of Virginia for this category of land disturbances.

Section II.B.4.b. - Required plan approval prior to commencement of the land disturbing activity. The operator shall require that land disturbance not begin until an erosion and sediment control plan or an agreement in lieu of a plan as provided in § 10.1-563 is approved by a VESCP authority in accordance with the Erosion and Sediment Control Act (§ 10.1-560 et seq.). The plan shall be: (1) Compliant with the minimum standards identified in 4VAC-50-30-40 of the Erosion and Sediment Control Regulations; or (2) Compliant with department-approved annual standards and specifications. Where applicable, the plan shall be consistent with any additional or more stringent, or both, erosion and sediment control requirements established by state regulation or local ordinance.

Section II.B.4.c. - Compliance and enforcement. (1) The operator shall inspect land-disturbing activities for compliance with an approved erosion and sediment control plan or agreement in lieu of a plan in accordance with the minimum standards identified in 4VAC50-30-40 or with department-approved annual standards and specifications. (2) The operator shall implement an inspection schedule for land-disturbing activities identified in Section II B 4 a as follows: (a) Upon initial installation of erosion and sediment controls; (b) At least once during every two-week period; (c) Within 48 hours of any runoff-producing storm event; and (d) Upon completion of the project and prior to the release of any applicable performance bonds. Where an operator establishes an alternative inspection program as provided for in 4VAC50-30-60 B 2, the written schedule shall be implemented in lieu of Section II B 4 c (2) and the written plan shall be included in the MS4 Program Plan. (3) Operator inspections shall be conducted by personnel who hold a certificate of competence in accordance with 4VAC-50-50-40.

Documentation of certification shall be made available upon request by the VESCP authority or other regulatory agency. (4) The operator shall promote to the public a mechanism for receipt of complaints regarding regulated land-disturbing activities and shall follow up on any complaints regarding potential water quality and compliance issues. (5) The operator shall utilize its legal authority to require compliance with the approved plan where an inspection finds that the approved plan is not being properly implemented. (6) The operator shall utilize, as appropriate, its legal authority to require changes to an approved plan when a inspection finds that the approved plan is inadequate to effectively control soil erosion, sediment deposition, and runoff to prevent the unreasonable degradation of properties, stream channels, waters, and other natural resources. (7) The operator shall require implementation of appropriate controls to prevent non-stormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land-disturbing activity inspections of the MS4. The discharge of non-stormwater discharges other than those identified in 4VAC50-60-1220 through the MS4 is not authorized by this state permit. (8) The operator may develop and implement a progressive compliance and enforcement strategy provided that such strategy is included in the MS4 Program Plan and is consistent with 4VAC50-30.

Section II.B.4.d. - Regulatory coordination. The operator shall implement enforceable procedures to require that large construction activities as defined in 4VAC50-60-10 and small construction activities as defined in 4VAC50-60-10, including municipal construction activities, secure necessary state permit authorizations from the department to discharge stormwater.

Section II.B.4.e – MS4 program requirements. The Salem VAMC shall use contract language to require contractors to submit and maintain all the necessary permits for construction activities. The Salem VAMC Facility Management Service (FMS) holds monthly project meetings to discuss the upcoming and on-going projects. The GEMS Coordinator will attend at least 2/3 of these meetings to monitor the impact on the MS4 program and determine the need for an Erosion and Sediment Control Plan. Contractors are responsible for completing and enforcing the Erosion and Sediment Control Plan for their construction sites, as well as providing certified inspectors. The plan will be submitted to the GEMS Coordinator through the Contracting Officer's Representative (COR). The COR is the primary contact for contractor's during construction activities. All requests for documents must go through the COR and all submittals are sent to the COR. The GEMS Coordinator and the COR will ensure the contractor has an Erosion and Sediment Control Plan approved by the Department of Environmental Quality (DEQ) before any land disturbance activities occur.

Salem VAMC Procedures.

The Salem VAMC has a Construction Safety Rounds Team that conducts weekly inspection of active construction projects. These weekly construction safety rounds are documented on the form included as page 13 of the MS4 plan. The entire form is embedded and can be access by double clicking the form. Any erosion or sediment

observed leaving the construction site will be documented on number 88 of the findings. The COR is responsible for following up with the contractors to ensure they are meeting the terms of their plan and permit. Noncompliance by the contractors with their permits and plans will be pursued by the COR through the Contracting Officer who has legal authority to discipline contractors.

Salem VAMC Safety Service shall inspect any Salem VAMC-managed construction sites that require an Erosion and Sediment Control Plan. Safety Service representative will be Certified Inspectors by the Virginia DEQ.

BMP 4A – Construction Safety Committee: The Salem VAMC has established policies and procedures that ensure construction projects will be planned, coordinated, and regularly inspected; to ensure compliance with applicable fire, infection control, environmental, security, safety and occupational health regulations and policies. The control of hazards created by construction or renovation projects is crucial in maintaining a high level of patient care and providing a safe environment for staff and visitors. Construction or renovation projects conducted at the Salem VAMC, or on its grounds, shall be continuously evaluated to ensure that hazards are being controlled, and that there are no recognized or uncontrolled hazards that could result in personal injury to a patient, staff member or visitor, or that could result in property or environmental damage. The Construction Safety Committee will serve to guide the overall facility construction safety program. The committee will have monthly meetings and conduct weekly inspection rounds.

BMP 4B – Projects Review Meeting: The Salem VAMC has a monthly projects review meeting that tracks all construction projects from design to final acceptance. The GEMS Coordinator attends this meeting and ensures that National Environmental Policy Act Reviews, and Erosion and Sediment Control Plans are completed prior to any regulated land disturbing activities.

Salem VAMC Construction Site Safety Review Checklist

Project # and Name: _____

Date and Time: _____

Name of Project COR/CSO Present During Inspection: _____

Construction Safety Committee Members Conducting Inspection:

- | | | | |
|---|--|---|--|
| <input type="checkbox"/> Mr. S. Branscome | <input type="checkbox"/> Mr. D. Hendley | <input type="checkbox"/> Mr. C. Helms | <input type="checkbox"/> Mr. W. Johnson |
| <input type="checkbox"/> Ms. S. Hile | <input type="checkbox"/> Mr. Z. Bradley | <input type="checkbox"/> Mr. E. Carpenter | <input type="checkbox"/> Ms. C. Scott / Mr. M. Raczynski |
| <input type="checkbox"/> Dr. K. Bulas | <input type="checkbox"/> Mr. W. Jennings | <input type="checkbox"/> Ms. S. Johnson | <input type="checkbox"/> Ms. J. Dinneen |
| <input type="checkbox"/> Mr. B. Fralin | <input type="checkbox"/> Mr. D. Finley | <input type="checkbox"/> Mr. Z. Eberbach | <input type="checkbox"/> Mr. A. Jackson |
| <input type="checkbox"/> | <input type="checkbox"/> Mr. P. Stultz | <input type="checkbox"/> Mr. S. Clay | |

Guests:
 _____ _____ _____

All Contractor personnel and Subcontractor employees are responsible to conduct work activities in a safe and healthful manner for their health and well-being as well VHA personnel. The purpose of this Site Safety Review is to increase the Contractor/Subcontractors awareness of the need for safe work habits and a positive attitude toward loss prevention and control. Below columns marked with "NC" answers require the Contractor/Subcontractors implementation of corrective action plans. Additional comments/actions will be described on additional pages to supplement this report.

	OK	NC	N/A		OK	NC	N/A
Safety & Health General				ICRA / ILSM (cont.)			
1. Safety Program / Injury illness Protectn Plan				57. Dust Control and containment			
2. Orientation/Code of Safe Practices/Badges				58. PPE: appropriate for ICRA			
3. Toolbox Meetings/Pre-Job Safety				59. Water / Pests / Mold / Asbestos / Lead			
4. Postings (OSHA) (Project Info/POC)				60. Sticky mats in place /Cleaned Entry/Exit			
5. Emergency Numbers/First Aid				61. ILSM in place – Exits Blocked/Locked			
6. Toilets/ Hand Wash/Drinking Water				62. 1 or 2 hr. fire separation based on ILSM			
Environment				Concrete Operations			
7. Finishes : Halls,Walls, and Furnishings				63. Cement/Silica dust exposures			
8. Illumination				64. Cutting Sawing/Grinding Controls			
9. Openings Guarded/Covered-Marked				65. PPE utilized by Crew			
10. Stairs/Walkways Guarded & Accessible				66. Wall or Structure Supported			
11. Rebars Capped				67. Pumps/equipment set-up/ cond.			
12. Equipment/Material Storage				Ladders			
13. Traffic/Public Safety				68. Ladder Conditions			
14. Chemicals: Proper storage and use				69. 3' Above Landing			
15. Construction Warning Signs Posted				70. Braced & Tied			
16. Ceiling Tiles: Wet / Damaged				71. A-Frame Step Ladder Set Up			
17. Housekeeping				72. Correct Height			
18. Emergency Exits: Unlocked/Unblocked				73. Servicability and Proper use			
Electrical Safety				Scaffolds/Shoring (Interior/Exterior)			
19. Cords, Plugs Conditions, Surge Protectors				74. Current certified installation docs.			
20. GFI Boxes & Grounding				75. Planks/toe boards			
21. Overhead Lines protected/marked/spotter				76. Railed Properly			
22. Lock out Tag Out				77. Tied to Structure			
23. Power/Generator/breaker panels secured				78. Ladder Access			
Personal Protection (PPE)				79. Daily Inspections			
24. Hard Hats				80. Users trained/Competent person			
25. Eye & Face Protection				81. Falling Object Protection			
26. Ear Protection				Excavations/Trench			
27. Gloves/Clothing				82. Daily Inspections/Competent Person			
28. Footwear				83. Shored/sloped > 5' or soil cond.			
29. Respiratory (Dust/Canister Masks)				84. Spoil Piles at least 2' from edge			
Site Security				85. Underground Line located/potholed			
30. Fencing				86. Barricades/protective measures			
31. Security				87. Ladder every 25' & after 4' deep			
32. Entrance/Exit				88. No visible erosion from site			
Hand/ Power/Powder Actuated Tools				Vehicle/Equipment Operations			
33. Guards attached/functional				89. Seat Belts by Operators			
34. Grounded Properly				90. Back Up Alarms – all Equipment			
35. Working Properly				91. Reflective garments/PPE			
36. Trained or Certified Operators/PPE				92. Personal cars in designated areas			
Fire Protection				93. Forklift operators trained			
37. Fire Extinguishers checked/accessible				94. Flagmen/Traffic Control			
38. Fire doors intact and operable				Scissors/Zoom Booms/Lift Trucks			
39. Smoke Barriers in place incl. ceiling tiles				95. Controls Operative			
40. Penetrations				96. Safety Chains in Place			

Minimum Control Measure #5 Post Construction Stormwater Management

Section II.B.5.a. - Applicable oversight requirements. The operator shall address post-construction stormwater runoff that enters the MS4 from the following land-disturbing activities: (1) New development and development on prior developed lands that are defined as large construction activities or small construction activities in 4VAC50-60-10; (2) New development and development on prior developed lands that disturb greater than or equal to 2,500 square feet, but less than one acre, located in a Chesapeake Bay Preservation Area designated by a local government located in Tidewater, Virginia, as defined in § 10.1-2101 of the Code of Virginia; and (3) New development and development on prior developed lands where an applicable state regulation or local ordinance has designated a more stringent regulatory size threshold than that identified in subdivision (1) or (2) above.

Section II.B.5.b. - Required design criteria for stormwater runoff controls. The operator shall utilize legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to require that activities identified in Section II.B.5.a address stormwater runoff in such a manner that stormwater runoff controls are designed and installed: (1) In accordance with the appropriate water quality and water quantity design criteria as required in Part II (4VAC50-60-40 et seq.) of 4VAC50-60; (2) In accordance with any additional applicable state or local design criteria required at project initiation; and (3) Where applicable, in accordance with any department-approved annual standards and specifications. Upon board approval of a Virginia Stormwater Management Program authority (VSMP Authority) as defined in § 10.1-603.2 of the Code of Virginia and reissuance of the Virginia Stormwater Management Program (VSMP) General Permit for Discharges of Stormwater from Construction Activities, the operator shall require that stormwater management plans are approved by the appropriate VSMP Authority prior to land disturbance. In accordance with § 10.1-603.3 M of the Code of Virginia, VSMPs shall become effective July 1, 2014, unless otherwise specified by state law or by the board.

Section II.B.5.c. - Inspection, operation, and maintenance verification of stormwater management facilities. (1) For stormwater management facilities not owned by the MS4 operator, the following conditions apply: (a) The operator shall require adequate long-term operation and maintenance by the owner of the stormwater management facility by requiring the owner to develop a recorded inspection schedule and maintenance agreement to the extent allowable under state or local law or other legal mechanism; (b) The operator or his designee shall implement a schedule designed to inspect all privately owned stormwater management facilities that discharge into the MS4 at least once every five years to document that maintenance is being conducted in such a manner to ensure long term operation in accordance with the approved designs. (c) The operator shall utilize its legal authority for enforcement of maintenance responsibilities if maintenance is neglected by the owner. The operator may develop and implement a progressive compliance and enforcement strategy provided that the strategy is included in the MS4 Program Plan. (d) Beginning with the issuance of this state permit, the

operator may utilize strategies other than maintenance agreements such as periodic inspections, homeowner outreach and education, and other methods targeted at promoting the long-term maintenance of stormwater control measures that are designed to treat stormwater runoff solely from the individual residential lot. Within 12 months of coverage under this permit, the operator shall develop and implement these alternative strategies and include them in the MS4 Program Plan. (2) For stormwater management facilities owned by the MS4 operator, the following conditions apply: (a) The operator shall provide for adequate long-term operation and maintenance of its stormwater management facilities in accordance with written inspection and maintenance procedures included in the MS4 Program Plan. (b) The operator shall inspect these stormwater management facilities annually. The operator may choose to implement an alternative schedule to inspect these stormwater management facilities based on facility type and expected maintenance needs provided that the alternative schedule is included in the MS4 Program Plan. (c) The operator shall conduct maintenance on its stormwater management facilities as necessary.

Salem VAMC Procedures.

The Salem VAMC utilizes the BMPs listed under MCM #4 to ensure post construction stormwater runoff is controlled.

Minimum Control Measure #6 Pollution Prevention/Good Housekeeping for Municipal Operations

Section II.B.6.a. - Operations and maintenance activities. The MS4 Program Plan submitted with the registration statement shall be implemented by the operator until updated in accordance with this state permit. In accordance with Table 1 in this section, the operator shall develop and implement written procedures designed to minimize or prevent pollutant discharge from: (i) daily operations such as road, street, and parking lot maintenance; (ii) equipment maintenance; and (iii) the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers. The written procedures shall be utilized as part of the employee training. At a minimum, the written procedures shall be designed to: (1) Prevent illicit discharges; (2) Ensure the proper disposal of waste materials, including landscape wastes; (3) Prevent the discharge of municipal vehicle wash water into the MS4 without authorization under a separate VPDES permit; (4) Prevent the discharge of wastewater into the MS4 without authorization under a separate VPDES permit; (5) Require implementation of best management practices when discharging water pumped from utility construction and maintenance activities; (6) Minimize the pollutants in stormwater runoff from bulk storage areas (e.g., salt storage, topsoil stockpiles) through the use of best management practices; (7) Prevent pollutant discharge into the MS4 from leaking municipal automobiles and equipment; and (8) Ensure that the application of materials, including fertilizers and pesticides, is conducted in accordance with the manufacturer's recommendations.

Salem VAMC Procedures.

In order to prevent illicit discharges, the Salem VAMC distributes an information pamphlet on the stormwater system to all staff via email once a year. The pamphlet is also distributed during the annual information booth for Earth Day. New Employee Orientation contains training for new employees on preventing illicit discharges and reporting spills. Employees are required to report spills to their supervisors or Safety Service.

The Salem VAMC has a comprehensive waste management program. Solid, hazardous, medical, and pharmaceutical wastes are managed by facility wide policies, called Medical Center Memorandum (MCM), that are maintained by Safety Service. The following MCMs regulate the management and disposal of wastes generated by the facility.

- MCM 658-001-03, Green Environmental Systems (GEMS)
- MCM 658-001-09, Pollution Prevention Plan
- MCM 658-001-23, Hazardous Spill Procedures
- MCM 658-001-84, Hazardous Materials and Waste Management
- MCM 658-001-87, Pharmaceutical Waste Disposal Policy

The Salem VAMC is a Small Quantity Generator. Hazardous wastes are collected monthly through a contracted service. Medical wastes are collected three (3) times a week through a contracted service. Solid wastes are collected three (3) times a week through a contracted service. Recycled materials are collected two (2) times a week through a contracted service.

The Salem VAMC has a contract in place to wash vehicles leased from GSA at an off-station car wash. FMS has been instructed not to allow their employees to wash vehicles on paved areas or areas where the runoff can enter the stormwater system. FMS has also been instructed not to provide equipment for vehicle washing to volunteer drivers. A vehicle washing area for VA-owned vehicles is established. The washing area is located in a grassy area of the facility that does not have any entry points for the storm water system nearby. The Salem VAMC is putting together workgroup to upgrade the vehicle washing area.

Wastewater will not be discharged into the stormwater system. If wastewater in an area not plumbed to the sanitary sewer system, a bladder will be installed and pumped out through a contract.

Water discharged from utility construction and maintenance activities will not be pumped into the stormwater system.

The method preferred by the Salem VAMC reduce the impact of bulk material on the storm water system is to cover bulk storage areas and control the exposure of the bulk materials to runoff. When this cannot be accomplished, the facility will provide dumpster or other open top containers to control the contamination of runoff. If neither of these options are viable, Safety Service will conduct monthly inspections of the bulk storage areas to prevent an excessive collection of bulk materials. Shops and Services not maintaining good housekeeping procedures will be notified by Safety Service. Shops and Services who remain noncompliant on daily housekeeping will be reported to the GEMS Committee. The GEMS Committee will then require an action plan to address the noncompliant issues.

The Salem VAMC uses absorbents to clean up fluids from automobiles to help prevent an accidental discharge into the stormwater system. The Facility contracts out mechanical services to maintain the leased GSA vehicles in good condition. The Salem VAMC employs a Vehicle Mechanic to maintain facility owned vehicles and equipment in good working condition.

Section II.B.6.b. - Municipal facility pollution prevention and good housekeeping. (1) Within 12 months of state permit coverage, the operator shall identify all municipal high priority facilities. These high-priority facilities shall include (i) composting facilities, (ii) equipment storage and maintenance facilities, (iii) materials storage yards, (iv) pesticide storage facilities, (v) public works yards, (vi) recycling facilities, (vii) salt storage facilities, (viii) solid waste handling and transfer facilities, and (ix) vehicle storage and maintenance yards. (2) Within 12 months of state permit coverage, the operator shall

identify which of the municipal high-priority facilities have a high potential of discharging pollutants. Municipal high priority facilities that have a high potential for discharging pollutants are those facilities identified in subsection (1) above that are not covered under a separate VPDES permit and which any of the following materials or activities occur and are expected to have exposure to stormwater resulting from rain, snow, snowmelt or runoff: (3) The operator shall develop and implement specific stormwater pollution prevention plans for all high-priority facilities identified in subdivision 2 of this subsection. The operator shall complete SWPPP development and implementation shall be completed within 48 months of coverage under this state permit. Facilities covered under a separate VDPEs permit shall adhere to the conditions established in that permit and are excluded from this requirement.

Section II.B.6.c. - Turf and Landscape management. (1) The operator shall implement turf and landscape nutrient management plans that have been developed by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia on all lands owned or operated by the MS4 operator where nutrients are applied to a contiguous area greater than one acre. Implementation shall be in accordance with the following schedule: (a) Within 12 months of state permit coverage, the operator shall identify all applicable lands where nutrients are applied to a contiguous area of more than one acre. A latitude and longitude shall be provided for each such piece of land and reported in the annual report. (b) Within 60 months of state permit coverage, the operator shall implement turf and landscape nutrient management plans on all lands where nutrients are applied to a contiguous area of more than one acre. The following measurable outcomes are established for the implementation of turf and landscape nutrient management plans: (i) within 24 months of permit coverage, not less than 15% of all identified acres will be covered by turf and landscape nutrient management plans; (ii) within 36 months of permit coverage, not less than 40% of all identified acres will be covered by turf and landscape nutrient management plans; and (iii) within 48 months of permit coverage, not less than 75% of all identified acres will be covered by turf and landscape nutrient management plans. The operator shall not fail to meet the measurable goals for two consecutive years. (c) MS4 operators with lands regulated under § 10.1-104.4 of the Code of Virginia shall continue to implement turf and landscape nutrient management plans in accordance with this statutory requirement. (2) Operators shall annually track the following: (a) The total acreage of lands where turf and landscape nutrient management plans are required; and (b) The acreage of lands upon which turf and landscape nutrient management plans have been implemented. (3) The operator shall not apply any deicing agent containing urea or other forms of nitrogen or phosphorus to parking lots, roadways, and sidewalks, or other paved surfaces.

Section II.B.6.d. - Training. The operator shall conduct training for employees. The training requirements may be fulfilled, in total or in part, through regional training programs involving two or more MS4 localities provided; however, that each operator shall remain individually liable for its failure to comply with the training requirements in this permit. Training is not required if the topic is not applicable to the operator's operations and therefore does not have applicable personnel provided the lack of

applicability is documented in the MS4 Program Plan. The operator shall determine and document the applicable employees or positions to receive each type of training. The operator shall develop an annual written training plan including a schedule of training events that ensures implementation of the training requirements as follows: (1) The operator shall provide biennial training to applicable field personnel in the recognition and reporting of illicit discharges. (2) The operator shall provide biennial training to applicable employees in good housekeeping and pollution prevention practices that are to be employed during road, street, and parking lot maintenance. (3) The operator shall provide biennial training to applicable employees in good housekeeping and pollution prevention practices that are to be employed in and around maintenance and public works facilities. (4) The operator shall ensure that employees, and require that contractors, who apply pesticides and herbicides are properly trained or certified in accordance with the Virginia Pesticide Control Act (§3.2-3900 et seq. of the Code of Virginia). (5) The operator shall ensure that employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations. (6) The operator shall ensure that applicable employees obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations. (7) The operators shall provide biennial training to applicable employees in good housekeeping and pollution prevention practices that are to be employed in and around recreational facilities. (8) The appropriate emergency response employees shall have training in spill responses. A summary of the training or certification program provided to emergency response employees shall be included in the first annual report. (9) The operator shall keep documentation on each training event including the training date, the number of employees attending the training, and the objective of the training event for a period of three years after each training event.

Salem VAMC Procedures.

Safety Service will distribute annually an information pamphlet which discusses the stormwater system and how to report spills. This same information pamphlet will be posted on the Safety Service SharePoint site and distributed during the Earth Day information booth. New Employee Orientation contains information on how to prevent pollution and report spills.

Safety Service is the only service responsible for monitoring for illicit discharges. The GEMS Coordinator will train the Safety Service annually on how to identify and report illicit discharges. FMS will be trained on how to identify and report illicit discharges during their annual training on storm water system responsibilities. This training will occur during Shop meetings. The GEMS Coordinator will maintain these training records as part of the MS4 program documentation.

The GEMS Coordinator will provide training to FMS annually on good housekeeping and pollution prevention practices when conducting: road, street, and parking lot

maintenance; and facility maintenance. The GEMS Coordinator will maintain these training records as part of the MS4 program documentation.

The Greenhouse Program Manager is the only individual licensed for pesticide or herbicide application at the Salem VAMC. She is licensed in accordance with state law. Contract language requires contractors to have the proper training and licensure to apply pesticides or herbicides at the Salem VAMC.

The GEMS Coordinator will request the training certificates for Erosion and Sediment Control Inspectors hired by contractors during construction activities. These will be requested from the COR and will be maintained by the GEMS Coordinator.

Safety Service will maintain at least two (2) individuals who are certified as Erosion and Sediment Control Inspectors. They will be trained by the DEQ. The GEMS Coordinator will maintain these training records as part of the MS4 program documentation.

The GEMS Coordinator will maintain all training records as part of the MS4 program documentation. These records will be maintained in the GEMS Coordinators office for at least three (3) years after the training event.

Section II.B.6.e. - The operator shall require that municipal contractors use appropriate control measures and procedures for stormwater discharges to the MS4 system. Oversight procedures shall be described in the MS4 Program Plan.

BMP 6A – Pollution Prevention Training: The Salem VAMC has a standard stormwater pollution prevention training program available to all employees through the Talent Management System (TMS). Employees are encouraged to review the module during their annual training.

BMP6B – SWPPP Review: The SWPPP is available for employees to review through the Salem VAMC public drive.

The Salem VAMC does not add any nutrients and does not require a nutrient management plan.