



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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October 14, 2020

Ms. Isis Otero
GEMS Coordinator
Hunter Holmes McGuire VA Medical Center
1201 Broad Rock Boulevard
Richmond, Virginia 23249

Transmitted electronically: isis.otero@va.gov

RE: Virginia Pollution Discharge Elimination System (VPDES) Permit No. VAR040116
Municipal Separate Storm Sewer System (MS4) Program Audit

Dear Ms. Otero:

The Commonwealth of Virginia Department of Environmental Quality (DEQ) would like to thank you for your time and assistance during the August 31-September 4, 2020, audit of the HH McGuire VA Medical Center MS4 Program. With this letter is a copy of the MS4 Program Audit report that contains needed corrective actions, as well as recommendations to improve the MS4 program. Within 30 days of receipt of this report, DEQ requests that you submit a written response describing how corrective actions contained in the MS4 Audit report were addressed.

If necessary, you may propose an alternative date by which to submit the requested response, provided sufficient reason is provided to support the alternative date.

Thank you for your efforts implementing the MS4 Program. If you have any questions, please contact Mercer Cronemeyer at 804-527-5024 or mercercronemeyer@deq.virginia.gov. DEQ looks forward to working with you as you continue to develop and refine your MS4 Program.

Sincerely,

A handwritten signature in green ink that reads "Kyle Ivar Winter".

Kyle Ivar Winter, P.E.
Deputy Regional Director

CC: Mason Harper (DEQ)
File



**Virginia Department of Environmental Quality
Municipal Separate Storm Sewer System (MS4)
Compliance Audit Checklist**

MS4 Name: HH McGuire VA Medical Center		Permit No: VAR040116
MS4 Contact (Name/Title): Isis Otero		Telephone: 804-675-5905
Date of Audit/Inspection: August 31-September 4, 2020		Notified of Inspection: Yes
DEQ Region: PRO		Weather (Wet/Dry/Rain): N/A-Desktop Audit
Date Report Issued: 10/14/2020		Response Due Date: 11/14/2020
DEQ Inspector(s) Present: N/A		
Programmatic Elements Reviewed: <input checked="" type="checkbox"/> Overall Program Management <input checked="" type="checkbox"/> Public Education & Outreach <input checked="" type="checkbox"/> Public Involvement/Participation <input checked="" type="checkbox"/> Illicit Discharge Detection & Elimination <input checked="" type="checkbox"/> Construction Stormwater Runoff <input checked="" type="checkbox"/> Post-Construction Stormwater Runoff <input checked="" type="checkbox"/> PP/GH for Municipal Operations		
MS4 Representatives Present:		
Name:	Department:	Phone Number/Email:
Isis Otero	Green Environmental Management Coordinator (GEMS)	804-675-5905
Opening Conference Notes: The Hunter Holmes McGuire VA Medical Center (HH McGuire) MS4 Audit occurred remotely as a “desktop audit”. A “desktop audit” replaced a field visit/meeting due to the ongoing Covid-19 pandemic. Utilizing documents available through DEQ and HH McGuire records requested by DEQ, DEQ staff performed a thorough review of the permittee’s MS4 programs. HH McGuire implements an MS4 Program out of the Engineering and Safety Offices and through the Green Environmental Management System (GEMS). The GEMS Coordinator is the individual who oversees the majority of the MS4 Program.		

Comments-Public Education and Outreach (MCM 1)

DEQ Audit Notes and General Comments:

- HH McGuire has identified three high priority water quality issues: 1) Reducing Total Suspended Solids (TSS) concentrations in stormwater, 2) Illicit discharges, and 3) Reducing local bacterial Total Maximum Daily Loads (TMDLs).
- Educational and outreach programs are specifically targeted to reach maintenance staff and contractors, VA employees and visitors, and the research staff and public with service dogs and/or pets.
- HH McGuire has selected two strategies for their public education and outreach activities. These include traditional written materials and training written materials.

Specific comments referenced to questions marked “No” in the checklist section above:

- Q8-The public can contact the Director for any issues at any time. Posters throughout the hospital contain the Director’s contact information, as does the website. However, the website does not currently contain information directly referencing the MS4 Program or questions the public may have about the permit or illicit discharges, etc. DEQ will note this as a corrective action.

Public Involvement and Participation (MCM 2)

Questions	Yes	No	N/A
1. Are procedures in place for the public to report potential illicit discharges, complaints regarding land disturbing activities, or other stormwater pollution concerns?	X		
2. Are procedures in place for the public to provide input on the permittee’s MS4 program plan?	X		
3. Are procedures in place to receive public input or complaints?	X		
4. Are procedures in place for responding to public input on the MS4 program plan or complaints?	X		
5. Are procedures in place for keeping documentation of public input received on the MS4 program and the permittee’s response?	X		
6. Did the permittee develop a webpage dedicated to the MS4 program and stormwater pollution prevention?		X	
7. Are the MS4 General Permit and permit coverage letter posted on the webpage?		X	
8. Is the current MS4 program plan posted on the webpage?		X	
9. Are all annual reports posted on the webpage?		X	
10. Does the webpage contain a mechanism (eg. “hotline”) for the public to report illicit discharge, improper disposal, spills to the MS4, complaints about land-disturbing activities, or stormwater pollution concerns?		X	
11. Does the webpage provide a method for the public to give input on the MS4 program plan?		X	

<u>Public Involvement and Participation (MCM 2)</u>			
Questions	Yes	No	N/A
12. Does the permittee implement a minimum of four activities each year for the public to become involved in improving water quality and supporting local restoration and clean-up projects?	X		
13. Do the activities (described in 12 above) fall into at least two of the following categories: monitoring, restoration, educational events, collection events, or pollution prevention?	X		
14. Does the permittee coordinate any of the public involvement opportunities with other MS4s?			X

Comments-Public Involvement and Participation (MCM 2)

DEQ Audit Notes and General Comments:

- HH McGuire encourages the reporting of stormwater pollution concerns (e.g. potential IDDE, spills, or other stormwater related concerns) to VA personnel, the front desk of the facility, or the GEMS committee. The Department of Veterans Affairs has incorporated an ISO model GEMS program for the management of its operations and waste generation.
- As part of its mission statement, GEMS “ ‘Solicits input, as appropriate, from stakeholders including staff, patients, visitors, and the local community regarding environmental matters affecting the operations of VAMC’s facilities.’ ” Stakeholders may provide comments similarly to the above reporting by contacting VA personnel directly, the front desk of the facility, the GEMS committee, or at the booth set up in the Canteen on Earth Day.
- It is the responsibility of the GEMS coordinator to track and investigate all stormwater related comments. MCM #3 addresses further procedures for the investigation and elimination of IDDE.
- HH McGuire implements a minimum of four public involvement and participation activities each year that fall into at least two of the permit-required categories. These include an annual Earth Day celebration where information on fighting climate change and stormwater pollution is disseminated; quarterly research lab inspections and waste collections that focus on the storage of hazardous materials and wastes and proper disposal; a summer stormwater facility maintenance event conducted by volunteers; yearly maintenance and tree planting of the facility arboretum (a Goode Creek Restoration Project) in collaboration with GIC and the City of Richmond; a medication collection program that takes place year-round at the facility; and visits to Community Based Outpatient Clinics (CBOCs) to evaluate and educate on waste management practices.

Specific comments referenced to questions marked “No” in the checklist section above:

- Q6-11-Although the public can contact the Director at any time, as noted on the webpage; the webpage does not currently contain the permit required information listed in Questions 6-11 of this MCM. DEQ will note these as corrective actions.

<u>Illicit Discharge Detection and Elimination (MCM 3)</u>			
Questions	Yes	No	N/A
1. Does the permittee maintain an updated and accurate MS4 map with all known outfalls and/or points of discharge?	X		

Recommendations:

- Overall MS4 Program Management:
 - DEQ recommends that Chesapeake Bay and Local TMDL Action Plans be incorporated by reference in the MS4 Program Plan.

Corrective Actions:

- MCM1-The website does not currently contain information directly referencing the MS4 Program or a clear method for the public to ask questions or provide input on the MS4 Program. Ensure that this is corrected.
- MCM2-At the time of the audit, the website provided did not contain the permit-required information listed in Questions 6-11 of this MCM, including:
 - A webpage dedicated to the MS4 Program and stormwater pollution prevention
 - Posting of the MS4 GP and permit coverage letter
 - Posting of the current MS4 Program Plan
 - Posting of all annual reports since the beginning of the current permit term
 - An IDDE hotline or explicit mechanism for public to report spills
 - A clear method for the public to give input on the MS4 ProgramEnsure that all of the above requirements are corrected.
- MCM3-The MS4 map associated information table does not include the permit required information specifically listed in Questions 10 and 13-14 of this MCM. Ensure that this is corrected.
- MCM5
 - Per permit requirements, ensure that the DEQ Construction Stormwater database is used to report all SMFs (constructed since July 1, 2014) installed on land-disturbing projects for which as CGP is required
 - Ensure that the DEQ BMP Warehouse is used to report all SMFs and BMPs as required by the permit and described in Question 17 of this MCM.
- MCM6-The written SOPs or procedures referenced in Questions 1 and 4-7 of this MCM are not included in the MS4 Program Plan or otherwise. Ensure that all permit-required SOPs for all referenced activities are developed.