DEPARTMENT OF VETERANS AFFAIRS
Medical Center
1055 Clermont Street
Denver CO 80220

March 10, 2003

In Reply Refer To:

Mr. Gregory Davis, 8EPR-EP
Small MS4 Storm Water Notice of Intent
U.S. EPA Region 8
999 18th Street, Suite 300
Denver, Colorado 80202-2466

RECD MAR 1 0 2003

Subject: **Notice of Intent for Coverage under National Pollutant Discharge Elimination System Small, Municipally-Separate Storm Sewer System General Permit No. COR042000**

Dear Mr. Davis:

This letter serves as the notice of intent (NOI) for coverage under National Pollutant Discharge Elimination System (NPDES) small, municipally-separate storm sewer system (MS4) General Permit No. COR042000. The U.S. Environmental Protection Agency (EPA), Region 8 proposed an NPDES general permit for storm water discharges from small MS4s operated by federal facilities in Colorado. NPDES permit coverage for these discharges is required in accordance with the 1987 Amendments to the Clean Water Act (CWA), and final EPA regulations for phase II storm water discharges (64 Fed. Reg. 68722, December 8, 1999). To obtain discharge authorization under the proposed permit, the Department of Veterans Affairs (VA) Eastern Colorado Health Care System (ECHCS) is submitting an NOI requesting authorization for storm water discharge under the general permit.

EPA Region 8 evaluated all federal properties within urbanized areas in Colorado. These federal properties were evaluated to determine whether they meet the definition of a small MS4 based on two criteria: (1) a storm sewer "system" exists at the facility; and (2) 1,000 or more people live or work at the facility on an average daily basis. Using these two criteria, EPA determined in its small MS4 fact sheet dated February 10, 2003 that ECHCS is required to apply for permit coverage.

The remainder of this letter contains the substantive information for the NOI and supporting documentation and is organized as follows:

- Facility Setting
- Activities at the Facility
- Facility Management
- Minimum Control Measures
- Eligibility Criteria for Threatened and Endangered Species
- Eligibility Criteria for Historic Properties
- Certification

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FACILITY SETTING

ECHCS is within the Denver urbanized area (UA) and its MS4 is completely surrounded by the City and County of Denver. The table below summarizes information pertaining to the ECHCS facility; the location of the ECHCS facility is shown on Figure 1.

GENERAL FACILITY INFORMATION

Facility Information	
Facility's Legal Name	Department of Veterans Affairs Eastern Colorado Health Care System (ECHCS)
Mailing Address	1055 Clermont Street Denver, CO 80220
Telephone No.	(303) 399-8020
SWMP Contact Information	
Contact Name	Safety Officer (Byron Abshier)
Contact Phone No.	(303) 399-8020 ext. 2654
Facility Characteristics	
Area of Land that Drains to ECHCS' MS4 (square miles)	0.02
Latitude and Longitude (of center of MS4 Area)	Latitude: 39°43'57" N Longitude: 104°46'07" W
Names of waters in the U.S. that receive discharges from the MS4	South Platte River

Notes:

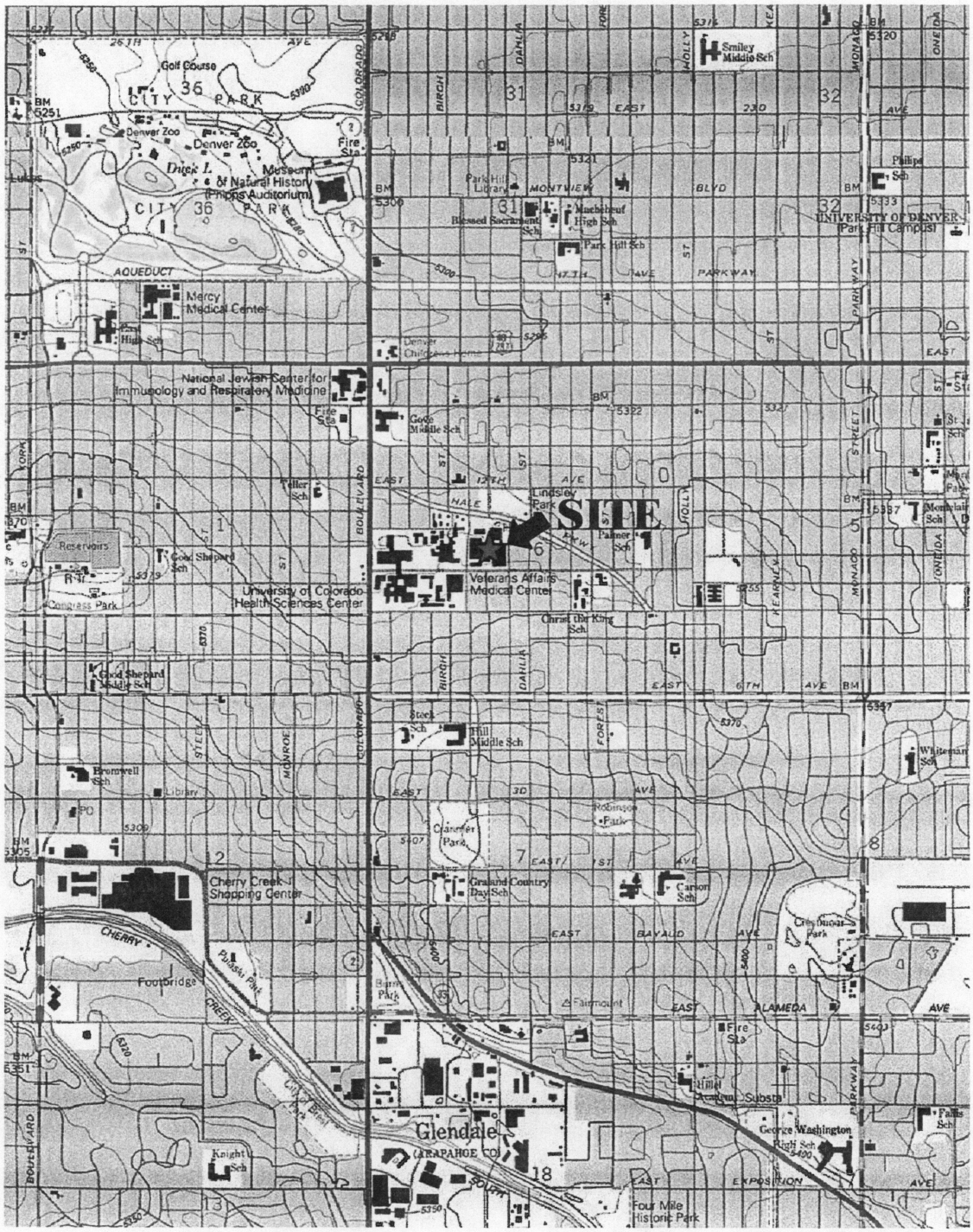
SWMP Storm water management program
MS4 Municipally-separate storm sewer system

ECHCS' MS4 discharges into Denver's MS4, which is covered under Colorado Department of Public Health and Environment (CDPHE) Colorado Discharge Permit System Municipal Storm Water Discharge Permit No. COS000001. Storm water originating at ECHCS flows underground from the site boundary northward until 16th Avenue where it flows westward. At City Park, the flow joins the City Park Storm Sewer, a 114-inch, 3-ring brick pipe. This, in turn, discharges to the South Platte River, a water of the United States. The City and County of Denver does not maintain the ECHCS MS4. There is no storm water runon from areas outside the ECHCS property and there is no runoff from the property.

ECHCS' MS4 is composed of several curb and gutter drains and catch basins that are connected underground. Figure 2 shows the facility's storm sewers, appurtenances, and drainage area (the property boundary). All storm water originating from the property is discharged through a single underground pipe at approximately Hale Parkway and Belaire Street.

ACTIVITIES AT THE FACILITY

The ECHCS is a 128-bed hospital with a regular staff of approximately 1,200 people. The primary standard industrial classification (SIC) code is 8062. An additional 1,000 people visit the facility on an average daily basis. Ancillary buildings include a workshop, outpatient buildings, power plant, and nursing home. The facility has a 7-story parking garage, with approximately 100 parking spaces per level. In addition, approximately 200 parking spaces exist at ground level. Eighty percent of the property is impervious to storm water.



LEGEND

★ SITE LOCATION

SOURCE:
USGS 7.5 MINUTE QUADRANGLE
ENGLEWOOD, COLORADO
LAST REVISED 1998

N

0.5 0 0.5

SCALE: 1" = 0.5 mile

VA ECHCS
1055 Clermont Street
Denver, Colorado

FIGURE 1
SITE LOCATION MAP

Tetra Tech EM Inc.

R:\Veterans\ sitelocmap.dwg 03/06/2003 Vincent.Cavanaugh DN

Outdoor storage facilities exist for gasoline (250-gallon, double-contained aboveground storage tank) and sealed and properly marked barrels of chemicals, as well as locked cabinets for additional hazardous materials storage. Two small tractors used for snow removal may be, at times, stored outside. Six double-contained storage tanks below grade in three locations for diesel fuel are also present on the property. Ten electrical transformers are located on the property. Photos of the property are included in Attachment A.

Other facility activities that have the potential to impact storm water include:

- Patients, visitors, and employees enter the medical center 24 hours a day, 7 days a week.
- Patients, visitors, and employees park their vehicles on the grounds and in a 7-story parking structure 24 hours a day, 7 days a week.
- Medical waste is picked up for disposal twice a day, Monday through Saturday at the back dock area of the hospital.
- Anti-neoplastic waste is picked up for disposal once a week at the back dock area of the hospital.
- General trash pick-up frequency is as follows:
  - Three 6-cubic-yard dumpsters are picked up Monday, Wednesday, and Friday
  - Two 8-cubic-yard dumpsters are picked up daily Monday through Friday
  - One 30-cubic-yard dumpster is picked up Monday, Wednesday, and Friday
- Laboratory hazardous waste is packed and picked up for disposal approximately every 6 months
- Radiological waste is picked up for disposal roughly once a year
- A number of vendors deliver goods Monday through Friday, 8:00 a.m. to 4:30 p.m.
- Liquid oxygen tanks are filled about once a week.
- The aboveground storage tank is filled once a year or as needed.
- The underground storage tanks are filled once a year or as needed.
- Snow removal is aided with granular, commercially-available snow melter, applied by hand; sand or gravel is applied to the property to aid traction on in the most severe weather.
- VA staff regularly maintain the grounds and remove trash
- Contractors visit the facility from 7:00 a.m. to 3:30 p.m.

VA staff regularly maintains the grounds and remove trash, and perform other functions as needed. These daily activities include:

- Employee 1 reports for duty at 7:00 a.m. and starts cleaning of the dock area including sweeping and using the pressure hose to rinse the area. All trash and debris on the ground in and around the trash compactor are collected.
- Employee 1 uses the Facilities Management Services (FMS) club car and makes rounds of the medical facility and collects all trash bags at all entrances, and so on. Parking garage trash is collected in the afternoon daily or as needed.
- Upon completion of the trash run, employee 1 returns to the dock area and operates the trash compactor to compress cardboard boxes; the compacted boxes are bailed with tie wire strands.
- Employee 2 reports for duty at 8:00 a.m. and starts cleaning the major entrance-ways including sweeping, picking up cigarette butts, and tidying up the entire area. Employee 2 is responsible for the 9th Street side, garage, and canteen area, and for the area around Buildings 19 & 21. Employee 1 is responsible for the Clermont Street side and the Nursing Home Care Unit.
- Staring at around 9:30 a.m. Employee 2 cleans the smoking shelters and empties all trash and butt containers. The employee also washes the sitting benches weekly.
- The smoking area on the 6th floor is checked on Tuesday and Thursday, and detailed on Monday, Wednesday, and Friday.
- The parking garage 1st floor is checked and trash emptied daily. The garage is detailed Monday, Wednesday, and Friday. Employees use the club car beginning on the 7th floor to empty trash and collect rubbish. Stairwells are cleaned as needed. With two people, this takes about 45 minutes.
- Summer activities include lawn maintenance and tree trimming. Curb gutters are cleaned and swept as needed.
- Assignments vary according to the needs of the service, but employee 2 generally works on the ground until 1: 00 p.m. and returns to the main building to pick up recyclables and to assist with the cleaning of rolling stock, and to restock Environmental Operations supplies, and perform other duties as assigned by the supervisor.
- At 3:00 p.m. employees ensure all equipment is cleaned and put away. Motorized snow removal equipment is started and operated to ensure it is running condition.

Activities that do not occur at the facility and materials that are not stored at the facility include:

- Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water
- Materials or residuals left on the ground or in storm water inlets from spills/leaks
- Materials or products exposed to storm water from past industrial activity
- Material handling equipment exposed to storm water (except adequately maintained vehicles)

- Materials or products exposed to storm water during loading/unloading or transporting activities
- Materials or products stored outdoors (except final products intended for outside use [for example, new cars] where exposure to storm water does not result in the discharge of pollutants)
- Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers, exposed to storm water
- Materials or products exposed to storm water handled/stored on roads or railways owned or maintained by the discharger
- Waste material exposed to storm water (except waste in covered, non-leaking containers [for example, dumpsters])
- Application or disposal of process wastewater (unless otherwise permitted)
- Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (that is, under an air quality control permit) and evident in the storm water outflow

FACILITY MANAGEMENT

Every 3 years, ECHCS seeks accreditation renewal by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO). As part of the accreditation process, the hospital is required to prepare and maintain seven different plans within its Environment of Care Management Program (ECMP):

1. Safety Management
2. Security Management
3. Hazardous Materials and Waste Management
4. Emergency Preparedness Management
5. Fire Prevention Management
6. Medical Equipment Management
7. Utility Systems Management

JCAHO compares the content of these plans with the Comprehensive Accreditation Manual for Hospitals (CAMH) and the Hospital Accreditation Standards which include all standards, intents, and policies in effect, including in part:

- Emergency management planning standards
- Environment of care standards
- Medical staff standards

JCAHO requires an Environment of Care with fundamental functions of safety, fire prevention, medical equipment, utilities management, security, hazardous materials, and emergency preparedness. Each of these functions is an element within each of five management processes: Design of the Environment;

Orientation and Education of Staff; Performance Standards of Staff; Information Collection and Evaluation System; and Improvement.

With these management plans and structures in-place at the hospital, the facility currently addresses storm water-related issues and is well equipped to incorporate activities necessary to comply with coverage under the small MS4 permit. For almost all storm water-related issues, current facility management plans and their components represent both a best management practice (BMP) and a measurable goal.

MINIMUM CONTROL MEASURES

The following sections discuss BMPs, measurable goals, and time frames for implementing the BMPs under the following six minimum control measures for storm water management:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping and Municipal Operations

The time frames listed in the tables in the sections below are relative to the time when ECHCS receives coverage under General Permit No. COR042000. For example, a BMP that will be implemented in year 1 will be implemented within 1 year of the time when ECHCS receives permit coverage. The majority of the BMPs listed below are already being implemented at VA ECHCS.

Public Education and Outreach on Storm Water Impacts

For purposes of this minimum measure, the public in ECHCS's MS4 is defined as employees, contractors, and visitors (or patients). Education and outreach on storm water impacts, however, will focus on employees and contractors because visitors have negligible potential for impact to the MS4 and are on site infrequently. Most of the BMPs listed below are already covered under existing facilities management plans, such as the ECMP.

BMP	Measurable Goal	Timeline
Hold refresher courses on safety and equipment cleaning and maintenance for employees who operate machinery	Course developed	Year 1
	Training implemented in ECMP	Year 2
Proper lawn and garden activities	Training implemented in ECMP	Completed
Proper disposal of hazardous wastes	Training implemented in ECMP	Completed
Trash management	Training implemented in ECMP	Completed
Contractual agreements with contractors to protect storm water	Contract language developed and used in new and renewed service contracts	Year 1
Storm water educational materials and posters	Material developed and distributed	Year 1
Pollution prevention	Information included on materials	Year 1
Storm drain stenciling	Drains stenciled	Year 1

Public Involvement/Participation

Because the MS4's public that has the greatest potential impact on storm water is employees and contractors, public involvement and participation is related to job descriptions and contracts. Requirements of staff and contractors related to storm water are largely already in place. Therefore, the major action under this control measure will be to maintain the responsibilities associated with BMPs listed in this NOI under employee job descriptions and contractual agreements with contractors. Employees are expected to be responsive; some employees are taking active roles in protecting storm water. For example one employee volunteers her time to pick up cigarette butts on the property.

Additionally, storm drain stenciling is a BMP that can enhance public awareness and participation at ECHCS.

BMP	Measurable Goal	Timeline
Storm drain stenciling	All drains stenciled	Year 1

Illicit Discharge Detection and Elimination

Eliminating and detecting illicit discharges is a responsibility of facilities management. The BMPs listed in the following table are already being conducted at ECHCS.

BMP	Measurable Goal	Timeline
Develop storm and sanitary sewer maps	Map created	Completed
Label storm and sanitary drains	Drains labeled	Completed
Develop an illicit discharge detection and elimination plan	Plan developed	Year 1
	Responsibility assigned	Year 1
	Tracking of detections and eliminations	Year 2
Control wastewater connections to storm drain system	Responsibility assigned	Completed
Prevent illegal dumping (security to keep people off the property)	Security in place	Completed

Construction Site Storm Water Runoff Control

Other than interior remodeling, no construction activities are planned at ECHCS. If construction activities occur, then construction contractors will be required to submit and be responsible for the appropriate construction storm water permit. This permit may include the following potential BMPs, as appropriate:

- Land grading
- Permanent diversions
- Construction entrances
- Soil retention
- Temporary slope drain
- Construction sequencing
- Dust control

- Install perimeter sediment controls
- Install sediment trapping devices
- Storm drain inlet protection
- General construction site waste management
- Spill prevention and control plan
- Vehicle maintenance and washing areas
- Contractor certification and inspector training
- Construction reviewer
- BMP monitoring and compliance

The measurable goal for this minimum measure is the construction storm water permit itself and BMP language included in the contract with the construction contractor. BMP monitoring and compliance will occur through ECHCS's facilities management staff as the owner's representative. The time frame for this minimum measure is on an as-needed basis, coinciding with a construction project.

Post-construction Storm Water Management in New Development and Redevelopment

The following BMPs will be the responsibility of facilities management. Additionally, facilities management will be the primary department that ensures long term operations and maintenance of all BMPs recommended in this NOI.

BMP	Measurable Goal	Timeline
Promote infiltration through landscaping practices	Alternate landscaping practices being implemented when possible	Year 1
Intercept rainfall from reaching roadways and parking lots	Choose appropriate landscaping when possible	Year 2
Direct downspouts to pervious areas	Downspouts directed when possible	Year 1
BMP inspection and maintenance	Responsibility assigned and documentation of inspection and maintenance activities	Year 2

Pollution Prevention/Good Housekeeping for Municipal Operations

All of the BMPs in the following table are already in place under the ECMP Emergency Preparedness Management Plan or facilities management. In addition, the facility will prepare a Storm Water Management Program that will include the following elements:

- Facility site map
- Description of potential pollutant sources, including an evaluation of that threat.
- Storm water management controls. The description of storm water management controls should address the following minimum components, including a schedule for implementing such controls:
  - Preventive maintenance
  - Good housekeeping
  - Spill prevention and response procedures

- BMPs for pollutant sources
- Employee training
- Inspection procedures
- Reporting procedures

BMP	Measurable Goal	Timeline
Infrastructure planning	Implemented in ECMP	Completed
Label all drums, cans, containers, tanks, and valves	Implemented in ECMP	Completed
Restrict access to area and equipment	Implemented in ECMP	Completed
Place trash receptacles in appropriate locations	Implemented in ECMP	Completed
Engineer critical areas with a berm or dike; paved bermed area, and valve or outlet pipe in containment area.	Implemented in ECMP	Completed
Reduce waste	Implemented in ECMP	Completed
Recycle	Implemented in ECMP	Completed
Store waste and recycling material in proper containers	Implemented in ECMP	Completed
Limit significant materials inventory	Implemented in ECMP	Completed
Provide roof to cover source area	Implemented in ECMP	Completed
Repair leaky roofs	Implemented in ECMP	Completed
Permanently seal drains within critical areas that discharge to the storm drain	Implemented in ECMP	Completed
Plug drains if necessary	Implemented in ECMP	Completed
Park vehicles and equipment indoors, under a roof, or on an impervious surface	Implemented in ECMP	Completed
Discharge wash water into sanitary sewer	Implemented in ECMP	Completed
Designated areas for washing nonvehicular air filters and other greasy equipment	Implemented in ECMP	Completed
Reduce the amount of liquid cleaning used	Implemented in ECMP	Completed
Use solvents efficiently	Implemented in ECMP	Completed
Automobile maintenance	Implemented in ECMP	Completed
Illegal dumping control	Implemented in ECMP	Completed
Landscaping and lawn care	Implemented in ECMP	Completed
Parking lot and street cleaning	Implemented in ECMP	Completed
Roadway and bridge maintenance	Implemented in ECMP	Completed
Alternative products; non-toxic or less toxic	Implemented in ECMP	Completed
Hazardous materials storage	Implemented in ECMP	Completed
Road salt application and storage	Implemented in ECMP	Completed
Spill response and prevention	Implemented in ECMP	Completed
Catch Basin, curb, and gutter cleaning	Implemented in ECMP	Completed
Coverings	Implemented in ECMP	Completed
Flow diversion	Implemented in ECMP	Completed
Handling and Disposal of Residuals	Implemented in ECMP	Completed
Internal reporting	Implemented in ECMP	Completed
Materials inventory	Implemented in ECMP	Completed
Preventive maintenance	Implemented in ECMP	Completed
Record keeping	Implemented in ECMP	Completed
Visual inspections	Implemented in ECMP	Completed

ELIGIBILITY CRITERIA FOR THREATENED AND ENDANGERED SPECIES

An evaluation of effects of the storm water discharges and discharge-related activities was conducted. Adverse effects to threatened and endangered (T&E) species and critical habitats are not likely based on the following factors:

1. No T&E species or critical habitats exist within ECHCS' MS4 based on a visual inspection of the ECHCS property.
2. ECHCS' MS4 is composed of underground piping and is in a highly urbanized area where there is no natural habitat.
3. The path of ECHCS' MS4 storm water is underground as it travels from ECHCS' property through the City of Denver's MS4 to the South Platte River.
4. ECHCS' MS4 discharge to and discharge-related activities is expected to have no impact on any T&E species and critical habitats within the South Platte River environment because ECHCS' contribution to that discharge is negligible compared to the City of Denver's MS4 permitted discharge and is in an urban setting where much of the South Platte River has been altered for flood protection. Thus, little native vegetation exists at the discharge point.

The Fish and Wildlife Service (FWS) field office has been contacted for an informal consultation under Section 7 of the Endangered Species Act regarding the impact to T&E species and critical habitats in the South Platte River from ECHCS' MS4 discharge. Although a response from FWS is not available at this time, FWS is expected to report to ECHCS and concur with the finding stated in this NOI.

ELIGIBILITY CRITERIA FOR HISTORIC PROPERTIES

Storm water discharges, allowable non-storm water discharges, and discharge-related activities will not affect a property that is listed or is eligible for listing on the National Register of Historic Places, as maintained by the Secretary of the Interior, because of the following factors:

1. ECHCS is not a historical property, according to the National Register of Historic Places (http://www.cr.nps.gov/rn)
2. The path of ECHCS' MS4 storm water is entirely underground on ECHCS' property and as it travels from ECHCS' property through the City of Denver's MS4 to the South Platte River.
3. Potential construction activities associated with BMP implementation could occur on ECHCS' property, which is not a historic property.

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 gathered and evaluated 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 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.*"

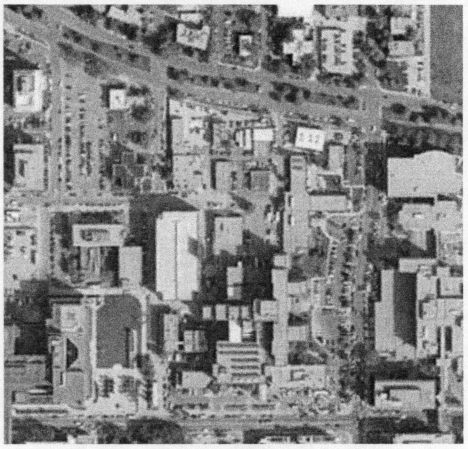
Date: 3/10/03

E. Thorsland, Jr., Director
Department of Veterans Affairs
Eastern Colorado Health Care System

ATTACHMENT A

SITE PHOTO LOG

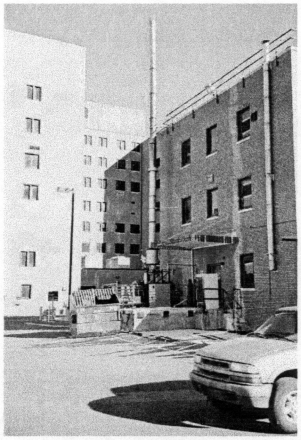
1055 Clermont.jpg



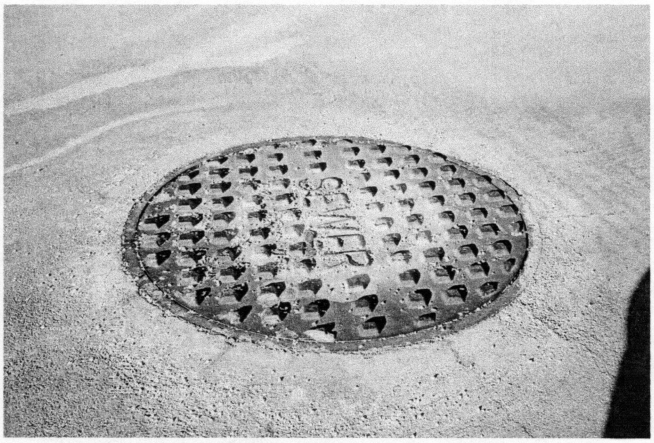
Aerial Photo.jpg

Diesel Fuel UST.jpg

Light Tractors.jpg



Carcass Incinerator.jpg

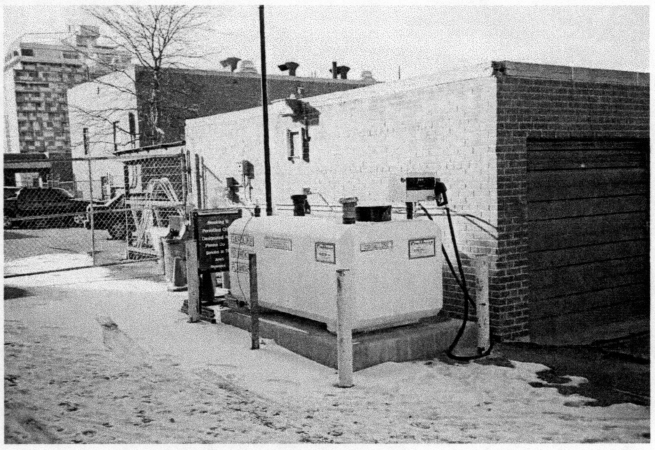


Granular Melter.jpg

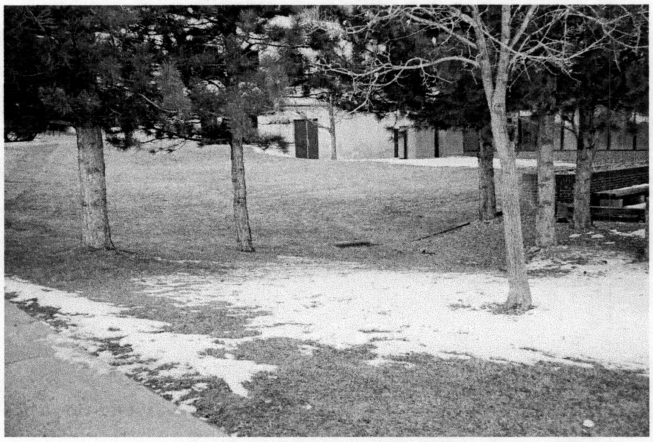
Parking Structure.jpg

Rooftops.jpg

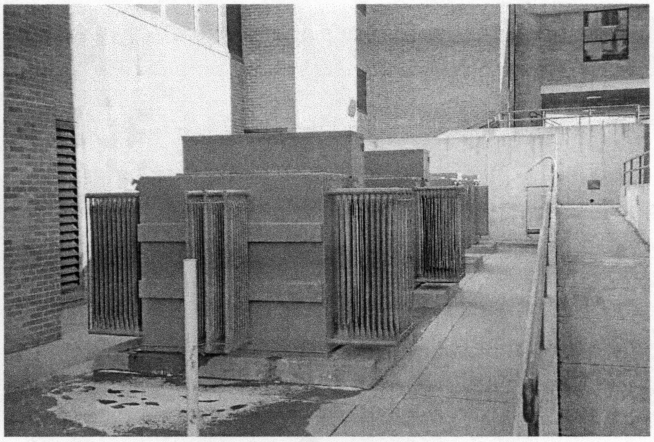
Power Plant.jpg



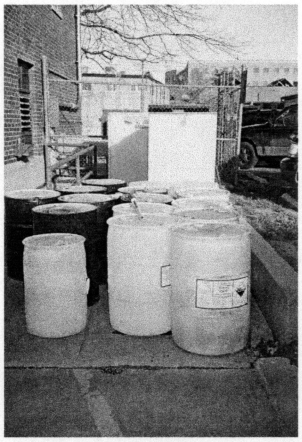
AST.jpg



Pervious Cover.jpg

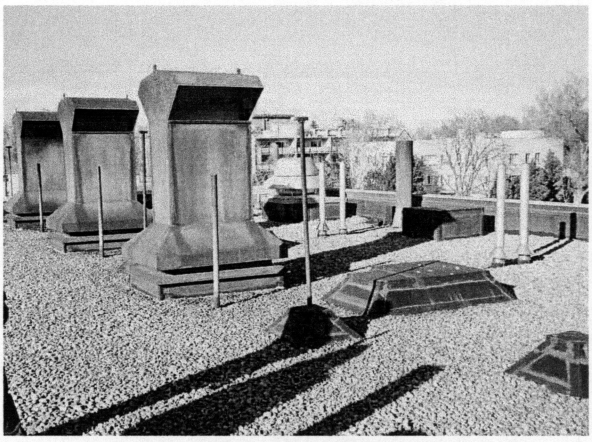


Transformers.jpg



Empty Drum Storage.jpg

Covered Dumpster.jpg



Clean Stacks.jpg

Loading Dock.jpg