
Stormwater Management Plan

For:

Southern Arizona VA Health Care System
3601 S. Sixth Avenue
Tucson, AZ 85723

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SECTION 1: INTRODUCTION

1.1 Background

The Southern Arizona VA Health Care System (SAVAHCS) filed a Notice of Intent (NOI) for coverage under the Arizona General Permit. The SAVAHCS was issued Arizona Permit No. AZG2016-002. SAVAHCS is covered by the Arizona general stormwater permit number AZG2016-002 under the Arizona Administrative Code R-18-9-A902(D)(1), R18-9-A902(D) (2), R-18-9-A902(E), and R18-9-A905(A)(1)(f) which incorporates 40 CFR 122.32. This permit authorizes stormwater discharges to waters of the State of Arizona resulting from a Small Municipal Separate Storm Sewer System (Small MS4). This permit became effective September 30, 2016 and will expire on September 29, 2021.

This Stormwater Management Plan (SWMP) is designed to limit the discharge of pollutants to the SAVAHCS' stormwater system to the maximum extent practicable. This plan consists of procedures SAVAHCS will follow to meet permit requirements as well as best management practices (BMPs) implemented to achieve the goals outlined in the Federal Clean Water Act and State of Arizona Stormwater Regulations.

1.2 Facility Description

The SAVAHCS is located at 3601 S. Sixth Avenue, Tucson, Arizona, 85723. The campus consists of a 107.8-acre property with approximately 81 buildings. The Julian Wash runs through the center of the campus flowing northwesterly to the Santa Cruz River. The Julian Wash and the Santa Cruz River are the receiving waters for the facility.

1.3 Outfalls

Stormwater on the SAVAHCS campus is collected in storm drain inlets and conveyed through a vast network of storm drain pipes. Most of the stormwater is conveyed through pipes and concrete or rock paths to various outfall points along the Julian Wash. Stormwater is also collected in numerous retention basins located throughout the campus.

1.4 Water Quality Concerns & Priorities

Most of the stormwater flowing from the Julian Wash ultimately drains into the Santa Cruz River. Neither the Julian Wash nor the Santa Cruz river is currently contained in the Arizona “impaired waters” list [2010 303(d) Category 5] or the “not attaining waters” list (Category 4). However, some of the biggest potential water quality concerns for these waters involve sediment loads from disturbed areas; fertilizers and pesticides from landscaping areas; and oil and grease from roadway and parking areas.

1.5 Threatened or Endangered Species and Historic Properties

HGS Engineering, Inc. completed a Phase I Environmental Site Assessment for SAVAHCS which was published in September 2009. As part of the assessment, it was determined that SAVAHCS is not eligible for the historic registry and there are no endangered or threatened species or historic sites within one mile of SAVAHCS.

1.6 *Non-stormwater discharges*

None of the non-stormwater discharge categories listed in section 1.3.2 of the facility permit, occurring within the jurisdiction of SAVAHCS, have been identified by SAVAHCS as significant contributors of pollutants to the stormwater system, from heretofore referred to as the MS4, and therefore do not need to be addressed in this plan.

1.7 *Roles and Responsibilities*

a. The Medical Center Director has overall responsibility for compliance with the stormwater regulations and the implementation of this plan.

b. The Chief of the Engineering Service will be responsible for:

1. Maintaining an up-to-date map of the municipal separate storm system and location of all outfalls;
2. Sampling of stormwater and performing analysis if an illicit discharge is detected;
3. Providing input to the annual report; and
4. Communicating requirements to contractors performing work that may have an impact on stormwater.

c. The Green Environmental Management Program (GEMS) Program Manager will be responsible for:

1. Maintaining all documentation required by the MS4 permit;
2. Providing training required by the MS4 Permit;
3. Performing outfall inspections; and
4. Preparing the annual report for submission to the Arizona Department of Environmental Quality (ADEQ).

SECTION 2: STORMWATER PROGRAM ENFORCEMENT

2.1 *Enforcement Requirements*

- a. Illicit connections and discharges originating from SAVAHCS's jurisdiction are prohibited.
- b. Only stormwater is to enter the MS4. Dumping or disposal of materials other than stormwater is prohibited.
- c. Contractors working at SAVAHCS are to follow requirements of the facility's permit and to minimize discharge of pollutants to the MS4 through installation, implementation, and maintenance of stormwater control measures which must be contained in their project proposal documents and the subsequent contract.
- d. Violators must cease and desist illicit discharges and spills in violation of the facility's permit and/or abate such discharges.
- e. An organizational chart identifying departments that conduct stormwater-related activities and their roles and responsibilities under the permit is contained in Appendix A.

2.2 *Enforcement Response Plan*

a. The VA Police Department at SAVAHCS will enforce violations of stormwater pollution on SAVAHCS property. First time offenders will be issued a United States District Court Violation Notice (USDCVN) under the VA Regulation 1.218 (b) Schedule of Offenses and Penalties, for (11) Disorderly Conduct, which tends to impede or prevent the normal operation of a service or operation of the facility. This offense carries a \$250 fine plus an additional \$30 court processing fee. In the event of a repeat offense, the case will be forwarded to the United States Attorney's Office, District

of Arizona and the Veterans Health Administration Regional Counsel for further review and guidance.

b. The stormwater enforcement plan will be amended as necessary and reviewed at least every year as part of the annual Stormwater Management Plan review.

SECTION 3: STORM SEWER SYSTEM MAPPING

3.1 *Storm Sewer Map Narrative*

SAVAHCS has developed a comprehensive storm sewer map that is contained in Appendix B. There are currently twenty-four (24) outfalls that discharge into the Julian Wash and ultimately into the Santa Cruz River. Some of the outfalls are pipes originating from stormwater inlets and others are concrete or rock paths that discharge stormwater runoff from areas near the Julian Wash. The map is updated annually or more often if new information becomes available.

SECTION 4: STORMWATER MANAGEMENT PROGRAM

4.1 *Required Elements*

a. A list of all receiving waters and their classification is contained in Section 1 of this Stormwater Management Plan.

b. The storm sewer map containing information about the storm sewer system, outfalls and receiving waters is contained in Appendix B and updated at least annually or as new information becomes available.

c. A listing of all non-stormwater discharges that cause or contribute to the exceedance of an applicable surface water quality standard are contained in Appendix C.

d. Description of practices to achieve compliance with the SAVAHCS stormwater permit parts 6.1, 6.2, 6.3, and 6.4 are contained Appendix D, the facility's Best Management Practices (BMPs). The BMPs designate:

1. Personnel responsible for each measure;
2. Measurable goals including milestones and timeframes, quantities and/or qualities;
3. Measure of assessment; and
4. Description of practices to achieve compliance with applicable waste load allocations.

e. Neither the Julian Wash nor the Santa Cruz River is currently contained in the Arizona "impaired waters" list [2010 303(d) Category 5] or the "not attaining waters" list (Category 4) according to the ADEQ website, <http://legacy.azdeq.gov/environ/water/permits/stormwater.html>, therefore an analytical monitoring program to ensure compliance with permit limitations, waste load allocations and surface water quality standards is not required. In the event the status of SAVAHCS receiving waters changes, an analytical monitoring program will be developed to include a Sampling and Analysis Plan that includes the following minimum components: sample collection, equipment and containers, decontamination, calibration procedures, sample frequency (based on illicit discharge characteristics), document site conditions, field notes, sample preservation, chain-of-custody tracking, and handling.

f. An annual review of the Stormwater Management Program will be done as part of the GEMS Program review. Copies will be maintained in Appendix J of the Stormwater Management Plan.

g. An organizational chart identifying departments that conduct stormwater-related activities and their roles and responsibilities under the permit is contained in Appendix A.

4.2 Stormwater Management Plan Availability

The Stormwater Management Plan is available on the SAVAHCS facility public website or upon request by contacting SAVAHCS' Engineering Service department at 520-629-1840.

SECTION 5: BEST MANAGEMENT PRACTICES TO ENSURE EFFLUENT LIMITATIONS

5.1 Minimum Control Measures

a. SAVAHCS will reduce pollutant discharges to the maximum extent practicable to protect water quality by implementing Minimum Control Measures also known as Best Management Practices in the following six categories:

1. Public Education and Outreach;
2. Public Involvement and Participation;
3. Illicit Discharge Detection and Elimination (IDDE) Program;
4. Construction Activity Stormwater Runoff Control;
5. Post-Construction Stormwater Management in New Development and Redevelopment;

and

6. Pollution Prevention and Good Housekeeping.

b. Specific requirements for Best Management Practices in each of the six categories are detailed in Appendix D.

5.2 Public Education and Outreach

SAVAHCS will implement an education program that includes educational goals based on stormwater issues of significance within the MS4 area. The objective of the Best Management Practices developed is to increase knowledge and change behavior of the public so that pollutants in stormwater are reduced.

5.3 Public Involvement and Participation

SAVAHCS will provide opportunities for the public to participate in the review and implementation of the Stormwater Management Plan.

5.4 Illicit Discharge Detection and Elimination Program

a. SAVAHCS will prohibit illicit discharges, including sanitary sewer overflows to and from the MS4 within its jurisdiction. An illicit discharge is any discharge that either is not composed entirely of stormwater unless authorized under a separate stormwater permit that authorizes the discharge or is an allowed non-stormwater discharge, by section 1.3.2 of the facility permit.

b. Through Best Management Practices and the performance of routine facility inspections, SAVAHCS will ensure that illicit discharges are prohibited and any illicit discharges discovered are eliminated, including those from properties not owned or operated by the MS4 that discharge into the MS4 system.

c. Upon detection of an illicit discharge, SAVAHCS will eliminate it as quickly as possible. All parties responsible for such discharge will be notified and immediately required to stop the discharge. Where elimination of an illicit discharge is not immediately possible, SAVAHCS shall establish an expeditious schedule for its elimination. All reasonable and prudent measures will be taken to minimize the discharge of pollutants to the MS4.

d. Enforcement procedures are described in Section 2.2 of this Stormwater Management Plan.

e. The non-stormwater discharges identified in section 1.3.2 of the facility permit do not need to be addressed as illicit discharges unless it is determined that the source is a significant contributor of pollutants. Non-stormwater discharges that cause or contribute to a violation of a surface water quality standard where no action is taken to eliminate the discharge of pollutants is a permit violation.

f. SAVAHCS' Engineering Service is responsible for implementing the IDDE Program and will annually provide training to the staff and public to prevent, identify, report and mitigate illicit discharges to and from the MS4.

g. Visual monitoring during both wet and dry weather will be conducted to identify, monitor and eliminate illicit discharges to ensure compliance with the facility permit. Follow-up screening will be performed and documented within 30 days for each identified or suspected illicit discharge. Copies of all visual monitoring activities will be maintained in Appendix H of the Stormwater Management Plan.

h. SAVAHCS' inventory of facilities and activities identified as having the potential to discharge to the MS4 are contained in Appendix E.

5.5 Construction Activity Stormwater Runoff Control

a. Construction specifications for activities that will disturb one or more acres of land, including sites less than one acre that are a part of a common plan of development, will include a requirement for the contractor to develop, implement maintain and enforce a stormwater runoff control program to minimize or eliminate pollutant discharge. Program requirements include:

1. Minimize the amount of disturbed area and protect natural resources;
2. Stabilize sites when projects are complete or operations have temporarily ceased;
3. Protect slopes on the site of the construction activity;
4. Protect storm drain inlets and armor all newly-constructed outlets;
5. Use perimeter controls at the site;
6. Stabilize entrances and exits at the location of the construction activity to prevent off-site tracking;
7. Inspect stormwater controls at consistent intervals; and
8. Control wastes, including but not limited to discarded building materials, paints, fertilizers, concrete washout, chemicals, litter, and sanitary wastes.

b. The developed stormwater runoff control program site plan design must be submitted to ADEQ for review.

c. SAVAHCS contracting officer's representatives (CORs) will evaluate compliance with the contractor's stormwater runoff control program as part of their routine construction site inspection program, document concerns, and ensure abatement.

5.6 Post-Construction Stormwater Management in New Development and Redevelopment

a. After construction activities are complete, SAVAHCS will ensure that new development and redevelopment sites that disturbed one or more acres of land, including sites less than one acre that are a part of a common plan of development design, install, and maintain post-construction stormwater controls that reduce or eliminate the discharge of pollutants from the site.

b. An inventory of all post-construction structural stormwater control measures installed and implemented at new development and redevelopment sites will be maintained in Appendix F of the Stormwater Management Plan.

5.7 Pollution Prevention and Good Housekeeping

a. An inventory of SAVAHCS facilities and activities that may discharge to the MS4 is contained in Appendix E.

b. Inspections of operations that might impact the MS4 are performed and resulting documentation is maintained in Attachment G. Inspection frequency for the facilities and activities that may discharge to the MS4 is based on their risk to discharge pollutants such as floatables, trash and other pollutants. The inspection schedule may be modified based on inspection findings.

c. Stormwater controls are developed and implemented for SAVAHCS facilities and activities to reduce or eliminate discharges to the MS4 such as floatables, trash and other pollutants.

d. Pollution prevention and good housekeeping training is provided to affected staff annually using a variety of media.

SECTION 6: PROGRAM ASSESSMENT, RECORDKEEPING AND REPORTING

6.1 Program Assessment, Recordkeeping and Reporting

a. An annual stormwater management program evaluation will be performed and documented. Copies are maintained in Appendix L of the Stormwater Management Plan. As part of the program evaluation, BMPs will be evaluated to assess the progress towards achieving the measurable goals and objectives set for each control measure.

b. Records will be kept for a minimum of five years.

c. A stormwater report will be submitted to ADEQ each year for the reporting period from July 1st through June 30th. The annual report is due September 30th each year for the reporting period. The annual report will contain:

1. The status of compliance with permit terms and conditions;
2. Updates regarding mapping requirements, including percent complete;
3. An evaluation of the appropriateness and efficacy of the selected BMP;
4. An assessment of the progress towards achieving the measurable goals and objectives of each BMP control measure, including description of the targeted messages for each audience; method of distribution and dates of distribution, methods used to evaluate the program and any changes to the program;
5. A description of the activities used to promote public participation;
6. A description of the activities related to implementation of the IDDE program

including status and results of illicit discharge potential protocols;

7. Outfall screening and monitoring data collected during the reporting period and cumulative for the permit term;

8. The status of any plans or activities required due to a discharge entering a receiving water on either the impaired or non-attaining water list;

9. Status of construction runoff management including number of project plans reviewed, number of inspections, and number of enforcement actions;

10. Status of stormwater management for new development and redevelopment including status of Directive development and review;

11. Status of the operation and maintenance programs;

12. Description of any changes in identified BMPs or measurable goals;

13. Any additional reporting requirements specified in the facility's permit; and

14. Description of activities to be conducted during the next reporting cycle.

SECTION 7: CONTACT INFORMATION

7.1 Contact Information

a. To provide feedback or obtain additional information about the SAVAHCS' Stormwater Management Program, contact the SAVAHCS' GEMS Manager, Jeanne Nordstrom at 520-629-1840.