

2009-2010 MS4 Permit Annual Report
Permit No.: COR-04202f

Report for 2009 and 2010

US General Services Administration
Public Buildings Service
Rocky Mountain Region
Denver Federal Center

Check box if this is a
new name, address, etc.

A. Permittee Information

Permittee: United States General Services Administration
Public Buildings Service
Mailing Address: DFC Service Center
1 Denver Federal Center
Gate 2, building 41, Dock E17A, Room 177
P.O. Box 25546
Denver, CO 80225-0546
Contact Phone Number: (303) 236-2547

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Have any areas been added to the MS4 (annexation/other legal means)? YES NO
If YES, include an updated map.

B. Reporting Period: March, 2008 to December 2010

C. Construction Program Contact

Have you assigned an appropriate contact person/work unit to address questions regarding
your municipality's construction and post-construction requirements? YES NO

If Yes: Bill Fieselman
Position/work group title: Environmental Programs Group
Contact phone number: (303) 236-2516
Email: william.fieselman@gsa.gov

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D. Implementation of Storm Water Management Plan

1. Implementation status of Storm Water Management Plan.

Area #1. Public Education and Outreach BMPs

BMP	Status Including Dates & Numeric Measures	Changes?
<u>Educational Materials</u> Year 5: Update brochure as necessary and distribute to all employees. Evaluate program effectiveness and plan for next permit term	1. Brochure updated & distributed to GSA & contract personnel involved in building & grounds management, operations & maintenance, 09/2007. 2. Storm Water BMP poster & brochures displayed at the DFC Earth Day Celebration, April 2009 & April 2010.	No
<u>Storm Drain Catch Basin Marking.</u> Year 5: Mark remainder of storm drain catch basins.	All storm drain catch basin marking completed 5/23/2008. Markers applied are still in good condition.	No

Area #2. Public Involvement and Participation BMPs

BMP	Status Including Dates & Numeric Measures	Changes?
<u>Storm Water Hotline</u> Year 5: Maintain / update as necessary, the hotline material / procedures.	The hotline contact phone number has been added to the Stormwater brochure.	No
<u>Employee Input into the Storm Water Program</u> Year 5: GSA EPG will review SWMP and solicit comment from building and agency personnel for changes to the SWMP.	Comments solicited and SWMP to be updated to address new MS4 permit conditions.	No

Area #3. Illicit Discharge Detection and Elimination BMPs

BMP	Status Including Dates & Numeric Measures	Changes?
<u>Maintain Existing Storm Sewer Map</u> Year 5: Update map as construction changes and modifications occur.	Storm sewer map updated in 2010. Additional updating will be required after completion of Utility Infrastructure Project and other construction projects on the DFC.	Yes

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BMP	Status Including Dates & Numeric Measures	Changes?
<u>Plug or Reroute Floor Drains Connected to the Storm Sewer</u> Year 5: no further action or reporting required.	Target completed.	No
<u>Perform Annual Dry-Weather Survey on Storm Water Outfalls</u> Year 5: Document dry weather inspection of all outfalls. Trace source of any non-storm water discharges and correct where appropriate. Evaluate program effectiveness for next permit term.	Annual Dry Weather Outfall survey conducted 8-24-2009. Non storm water discharge was detected in several outfalls. Most of our outfalls are below the groundwater level and so they reflect groundwater seepage. We are currently working to establish whether all of the flow detected is groundwater seepage. Annual Dry Weather Outfall survey not conducted in 2010 due to extensive construction in the area of the outfalls. CCTV inspection of a section of the stormdrain at the USGS Building 20 was completed in 2010 to locate source(s) of dry weather flows. Sampling and analysis of the dry weather flow was also completed.	Yes
<u>Assess Non-Storm Water Discharges</u> Year 5: Modify the SWMP to address any non-storm water discharges found to affect storm water at the DFC.	The new MS4 permit issued in 2011 will require additional and more extensive monitoring, followed by sampling if necessary, to identify potential non-stormwater discharges.	Yes
<u>Develop Contract Language Prohibiting Non-Storm Water Discharges</u> Year 5: Incorporate language into new contracts. This is now integrated into all contracts and so it will no longer be a separate BMP item.	Language developed in 2005 and updated in 2007 has been incorporated into contracts.	No

Area #4. Construction Site Storm Water Control BMPs

BMP	Status Including Dates & Numeric Measures	Changes?
<u>Maintain Contract Language Requiring Proper Construction Site Waste Control and Disposal</u> Year 5: Maintain and update contract language as necessary. Evaluate program effectiveness and plan for the next term.	Maintained and current.	No

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BMP	Status Including Dates & Numeric Measures	Changes?
<u>Require E&SC Plans Year 5:</u> Incorporate language into new contracts. This was implemented 2 years ago and is an inherent feature of the DF Excavation permit. It will no longer be a separate BMP item.	Relevant contract language implemented in 2005. The DFC Excavation Permit contains an Erosion and Soil Control Plan form.	No
<u>Develop Construction Site Inspection Procedures Year 5:</u> Implement inspection procedures and maintain records of each inspection, including any follow-up actions required. Evaluate program effectiveness and plan for the next term.	All construction or remodeling on the DFC requires a DFC Excavation permit. Inspection forms have been used and maintained since 2006.	No

Area #5. Post-Construction Storm Water Management BMPs in New Development and Redevelopment

BMP	Status Including Dates & Numeric Measures	Changes?
<u>Develop Contract Language Requiring Post-Construction Storm Water Management Year 5:</u> Incorporate language into contracts; keep records of reviews and project designs for conformance with criteria.	Language is incorporated in contracts and updated as appropriate. Construction projects including The State Department project (ESOC West) and the PV Array projects included requirements for stormwater management including conformance with the EISA Section 438 requirements in construction contracts.	Yes
<u>Stormwater Design Reviews</u> <u>Conduct reviews of stormwater management for proposed new development and redevelopment construction projects.</u>	A thorough review of the post construction storm water management BMPs was completed at the 30, 60, 90 and 100% design stages for the following construction projects during 2009 and 2010: RTD, USAR, ESOC West and PV Array. The review included design drawings, specifications, SWPPP, construction dewatering plans and drainage analysis reports. In addition to conformance with the City of Lakewood and CDPHE requirements the projects were required to comply with the EISA Section 438 requirements and to specify appropriate BMPs and LIDs.	Yes

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Area #6. Pollution Prevention/Good Housekeeping BMPs for Municipal Operations

Note: All best management practices covered in area #6: Pollution prevention/Good Housekeeping BMP's for Municipal Operations have been incorporated into the DFC Sustainability and Environmental Management System.

BMP	Status Including Dates & Numeric Measures	Changes?
<p><u>Storm Water Management Training Year 5:</u> Conduct training as needed and maintain written records of training materials and attendance. Evaluate program effectiveness and plan for the next term.</p>	<p>1. The SEMS Stormwater Environmental requirements are posted, for access by all tenants and contractors, on the GSA public regional website. 2. Annual Stormwater update training was conducted for all property management and operations & maintenance personnel in September 2007.</p>	No
<p><u>Landscaping and Lawn Care Year 5:</u> Maintain and update existing procedures, which minimize use of chemicals. Added for 2007: Report on runoff reduction projects driven by our SEMS.</p>	<p>1. Updated SEMS Environmental procedures were incorporated into the contract in 2007. Product lists are reviewed by the SEMS Project Manager to ensure compliance with green purchasing requirements. 2. Projects to reduce runoff: - 1,000 sq ft of irrigated bluegrass removed and replaced with Xeriscape landscaping in 2009 and 2010. - 4,800 sq ft of asphalt roadway, curb & gutter removed and area re-seeded with native seed mix.</p>	No
<p><u>Pest Control: Year 5:</u> Maintain and update existing procedures. Evaluate program effectiveness and plan for the next term</p>	<p>Maintained. Only EPA approved baits and residuals are used. Environmental requirements relating to stormwater were emphasized to the new contractor June 2008.</p>	No
<p><u>Street and Parking Lot Sweeping Year 5:</u> Maintain and update existing procedures. Evaluate program effectiveness and plan for the next term</p>	<p>Maintained and Current.</p>	No
<p><u>Road and Parking Lot Deicing Year 5:</u> Maintain and update existing procedures. Evaluate program effectiveness and plan for the next term</p>	<p>Maintained and Current. Note that DFC has switched to almost exclusive use of magnesium chloride for deicing with sodium chloride only used as necessary for ice melt.</p>	No

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BMP	Status Including Dates & Numeric Measures	Changes?
<u>Hazardous Material Storage</u> Year 5: Maintain existing procedures and update, as necessary thereby meeting all RCRA requirements. Evaluate program effectiveness and plan for the next term	Maintained and Current: The DFC Hazardous Waste Program was audited by CDPHE in March 2008, with no violations found.	No
<u>Spill Response</u> Year 5: Update and maintain both the SPCC plan and the Emergency Response Plan, as necessary. Evaluate program effectiveness and plan for the next term	The Contingency Plan & Emergency Response Procedures document was updated in January 2008. The SPCC plan is being updated and will be completed in early 2012.	Yes
<u>Catch Basin Mapping and Cleaning:</u> Inspect and locate the catch basins and update the stormwater drainage system map.	Location of the catch basins throughout the DFC were mapped using a hand held GPS unit. Approximately 280 catch basins were located using a handheld GPS unit during 2009 and 2010. The existing stormwater drainage system map was updated with the locations of the catch basins. Each of the catch basins was also inspected for the amount of sediment to determine whether cleaning was required. Based on the inspections more than 60 catch basins were cleaned of sediment and debris.	Yes
<u>Stormwater Masterplan:</u> Develop a stormwater plan to aid in stormwater quantity and quality management as well as achieve compliance with the current and future City, State and Federal stormwater requirements.	A Stormwater Masterplan was developed between 2009 and 2011 for the entire DFC. Hydrologic and Hydraulic models using EPA SWMM for existing, intermediate and proposed conditions were developed. These models were utilized in the designs of ESOC West, USAR and PV Array projects for stormwater quantity and quality management.	Yes

2. Results

Results of information collected and analyzed, if any, during the reporting period:

<u>Perform Annual Dry-Weather Survey on Storm Water Outfalls</u> Year 5: Document dry weather inspection of all outfalls. Trace source of any non-storm water discharges and correct where appropriate.	Annual Dry Weather Outfall survey conducted 8-24-2009. Non storm water discharge was detected in several outfalls. Most of our outfalls are below the groundwater level and so they reflect
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	<p>seepage. We are currently working to establish whether all of the flow detected is groundwater seepage. Annual Dry Weather Outfall survey not conducted in 2010 due to extensive construction in the area of the outfalls.</p> <p>CCTV Inspection of a section of the stormdrain at the USGS Building 20 was completed in 2010 to locate source(s) of dry weather flows. Sampling and analysis of the dry weather flow was also completed. It was determined that the source was ground water seepage and did not contain any contamination.</p>
<p><u>Completed BMP targets:</u> Marking of storm drains, plugging/rerouting of cross connections and development and implementation of contract language and inspection procedures.</p>	<p>Completed targets will no longer be listed as separate BMPs. They will be included in maintenance BMPs in the new DFC permit issued in 2011.</p>
<p><u>Catch Basin Mapping and Cleaning:</u> Inspect and locate the catch basins and update the stormwater drainage system map.</p>	<p>Location of the catch basins throughout the DFC were mapped using a hand held GPS unit. Approximately 280 catch basins were located using a handheld GPS unit during 2009 and 2010. The existing stormwater drainage system map was updated with the locations of the catch basins. Each of the catch basins was also inspected for the amount of sediment to determine whether cleaning was required. Based on the inspections more than 60 catch basins were cleaned of sediment and debris.</p>
<p><u>Stormwater Design Reviews</u> Conduct reviews of stormwater management for proposed new development and redevelopment construction projects.</p>	<p>A thorough review of the post construction storm water management BMPs was completed at the 30, 60, 90 and 100% design stages for the following construction projects during 2009 and 2011: RTD, USAR, ESOC West and PV Array. The review included design drawings, specifications, SWPPP, construction dewatering plans and drainage analysis reports. In addition to conformance with the City of Lakewood and CDPHE requirements the projects were required to comply with the EISA Section 438 requirements and to specify appropriate BMPs and LIDs.</p>
<p><u>Stormwater Masterplan:</u> Develop a stormwater plan to aid in stormwater quantity and quality management as well as achieve compliance with the current and future City, State and Federal stormwater requirements.</p>	<p>A Stormwater Masterplan was developed between 2009 and 2011 for the entire DFC. Hydrologic and Hydraulic models using EPA SWMM for existing, intermediate and proposed conditions were developed. These models were utilized in the designs of ESOC West, USAR and PV Array projects for stormwater quantity and quality</p>

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	management.
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3. Inspections and Enforcement

A summary of the number and nature of inspections and formal enforcement actions performed.

Area #4. Construction Site Storm Water Control BMPs: 56 DFC Excavation permits with Storm Water Management requirements were issued in 2009 and 50 DFC Excavation permits were issued in 2010. Excavation sites are inspected by EPG personnel or the Custodial Project Manager. When major soil (1+acre) disturbance occurs, a Storm Water Pollution Prevention Plan is required and a NOI filed with the EPA. Two NOIs were filed during this reporting period: One for the IA10S RFI project and the other for the IA10S remediation project.

Area #6. Pollution Prevention/Good Housekeeping BMPs: The EPA audited our Hazardous Waste program in March 2008. We received a certificate stating that no violations were found and we were commended on the efficient operation and management of our program.

4. Proposed Changes to the Storm Water Management Plan.

Annual review of the DFC SEMS Environmental procedures began in 2008, in order to ensure that these align with SEMS requirements and our sustainability objectives. Our Stormwater BMPs form part of our SEMS requirements, goals and targets relating to stormwater leaving this facility, which are:

1. No non-stormwater discharges
2. Improvement in the quality of stormwater leaving this facility
3. Reduction in the volume of stormwater leaving this facility

Our one-time BMP's have now been completed: marking of all storm drains and plugging or re-routing of cross connections.

Our updated Stormwater Management Plan, will be finalized after receipt of the new DFC MS4 Permit in late 2011.

Sale of 65 acres of DFC land for the St Anthony Hospital and RTD projects resulted in capping the storm sewer lines in those areas of land. However, the storm sewer line down Center Avenue from the old boundary to our new boundary has been retained, as it is one of our main lines. The 2 catch basins located between the old and new boundary fences now fall under the jurisdiction of the City of Lakewood, introducing a potential for external party impact on our stormwater.

5. Activities for Next Reporting Cycle.

Area #1. Public Education and Outreach BMPs

- **Educational Materials:** Distribute electronically to all employees. Include stormwater information in the New Hire and Annual Refresher SEMS trainings.

Area #2. Public Involvement and Participation BMPs

EPA-BAFB-00001148

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- Storm Water Hotline: Maintain/update as necessary the hotline material/procedures. Evaluate program effectiveness and plan for next permit term.
- Employee Input into the Storm Water Program: GSA EPG will continue to review the Storm Water Management Plan and solicit comments from building and agency personnel for changes to the SWMP.

Area #3. Illicit Discharge Detection and Elimination BMPs

- Maintain Existing Storm Sewer Map: Annually review, to ensure that changes to the DFC Storm Sewer System are incorporated into the Storm Sewer map.
- Perform Annual Dry-Weather Survey on Storm Water Outfalls: Document dry weather inspections of all outfalls. Trace source of any non-storm water discharges and correct where appropriate. Evaluate program effectiveness and plan for next permit term.
- Assess Non-Storm Water Discharges: Assess whether the SWMP will need to be modified to address any non-storm water discharge.

Area #4. Construction Site Storm Water Control BMPs

- Maintain Contract Language Requiring Proper Construction Site Waste Control and Disposal: Ensure implementation of any updates, following annual review of SEMS procedures and sustainability performance.
- Monitor Construction Site Inspection Procedures: Monitor, review and update if necessary, inspection procedures, records and any follow-up actions required.

Area #5. Post-Construction Storm Water Management BMPs in New Development and Redevelopment

- Contract Language Requiring Post-Construction Storm Water Management: Monitor the implementation of updates in contract language. Record reviews of project designs for conformance with criteria. Evaluate program effectiveness and plan for next permit term.

Area #6. Pollution Prevention/Good Housekeeping BMPs for Municipal Operations

- Storm Water Management Training: Conduct annual refresher training for Operations & Maintenance personnel, maintaining written records of training material and attendance in accordance with SEMS requirements. All training materials will be made available on the GSA website. Evaluate program effectiveness and plan for next permit term.
- Landscaping and Lawn Care – Maintain and update existing program, as necessary. Evaluate program effectiveness and plan for next permit term.
- Road and Parking Lot Deicing – Maintain and update existing program, as necessary. Evaluate program effectiveness and plan for next permit term.
- Street and Parking Lot Sweeping – Maintain and update existing procedures as needed. Evaluate program effectiveness and plan for next permit term.
- Hazardous Material Storage - Maintain and update existing procedures as needed. Evaluate program effectiveness and plan for next permit term.

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- Spill Response - Maintain and update existing procedures as needed. Evaluate program effectiveness and plan for next permit term.

6. Notice of Program Element Operation by a Second Party

As of the date of this report, no other governmental entity is responsible for satisfying any part of these permit obligations.

E. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature of Permittee (legally responsible person)	Title	Date Signed
John Kleinschmidt	DFC Environmental Manager	5/14/12