



U.S. General Services Administration

March 27, 2017

Stormwater Coordinator (8P-W-WW)  
Small MS4 Annual Report  
US EPA Region 08  
1595 Wynkoop Street  
Denver, CO 80202-1129

Re: *2016 MS4 Permit Annual Report, Denver Federal Center, Lakewood, Colorado*  
Permit No. CO-R 042004.

Dear Stormwater Coordinator:

Enclosed please find the original of the subject MS4 Permit Annual Report.

Please contact me with questions.

Sincerely,

A handwritten signature in blue ink that reads "Bill Fieselman".

Bill Fieselman  
The Arcanum Group, Inc.  
Supporting GSA Region 8 PBS  
One Denver Federal Center  
Building 41  
Denver, CO 80225-0546  
(303) 236-2516

enclosure

cc: Stephanie Downs – GSA  
Dave Williams – GSA  
John Kleinschmidt - GSA  
Niki Lecander - GSA

Rocky Mountain Region  
Denver Federal Center  
Service Center (8PD)  
P.O. Box 25546  
Building 41, Room 240  
Denver Federal Center  
Denver, CO 80225-0546  
[www.rmrpbs.gov](http://www.rmrpbs.gov)

Report for 2016, due April 1, 2017

**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	<input type="checkbox"/>
	Public Buildings Service	
Mailing Address:	DFC Service Center	<input type="checkbox"/>
	1 Denver Federal Center	
	Gate 2, Building 41, Dock E17A, Room 177	
	P.O. Box 25546	
	Denver, CO 80225-0546	
Responsible Official:	Stephanie Downs, Director, Colorado Service Center	<input type="checkbox"/>
Contact Phone Number:	(303) 236-2547	<input type="checkbox"/>

**Permit No.: COR-042004**

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

Note: The acreage of the DFC was listed in the Statement of Basis/MS4 Permit, signed October 20, 2011, as “about 670 acres.” Portions of the property were transferred to the City of Lakewood/St Anthony’s Hospital in September 2007. Based on an exterior perimeter survey conducted August 17, 2012, the total acreage of the DFC is 611.5 acres.

**B. Reporting Period: January 1 – December 31, 2016**

**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: With regard to stormwater related construction and Post-construction issues:

	Bill Fieselman
Position/work group title:	Environmental Programs Group
Contact phone number:	(303) 236-2516
Email:	<u><a href="mailto:william.fieselman@gsa.gov">william.fieselman@gsa.gov</a></u>

**D. Inspection and Monitoring Results**

BMP	Status Including Dates & Numeric Measures	Changes?
<p>Sec. 1.3.3.2 - The monthly inspection results taken during the first permit year and the annual sampling results shall be reported in the MS4 Annual Report described in Part 3.3</p>	<p>The monthly inspection results (collected during the 1<sup>st</sup> year of this permit) showed that 5 of the 13 outfalls monitored discharge non-stormwater. Per permit requirements, DFC began monitoring these 5 outfalls for the constituents listed in Section 1.3.3.1 of the permit. Attachment 1 provides the results of this monitoring. GSA also implemented monthly inspection of outfalls along the Agricultural Ditch where it passes through the DFC. During the 12 months of monthly inspections of these outfalls, there have been no observed continuous discharges from any outfall. The monthly outfall inspection records can be submitted to EPA upon request.</p>	<p>Yes</p>

**E. Implementation of Storm Water Management Plan**

**1. Implementation status of Storm Water Management Plan.**

**General Requirements**

BMP	Status Including Dates & Numeric Measures	Changes?
<p>Sec. 2.1.1 - The permittee must continue to develop, implement, and enforce a SWMP. The SWMP must include management practices, control techniques, system design, engineering methods, and other provisions the permittee or EPA determines appropriate for the control of pollutants in discharges from the MS4.</p>	<p>A new SWMP was developed. In July 2013 the SWMP was submitted to EPA for any input they may have on the document. Implementation of the SWMP continued while soliciting input. In March 2014, EPA provided minor comments on the SWMP and GSA modified the SWMP to address those comments. GSA</p>	<p>No</p>

BMP	Status Including Dates & Numeric Measures	Changes?
	continues to actively implement the SWMP.	
Sec. 2.1.2 - The permittee must fully implement the SWMP; including meeting its measurable goals. Implementation should take place in approximate equal intervals throughout the permit and progress will be tracked in the annual report (see Part 3.3).	GSA continues to actively implement all phases of the SWMP.	No
Sec. 2.1.3 - The SWMP must include each of the minimum control measures of Parts 2.2-2.7.	The new SWMP includes sections on each of the minimum control measures: Public Education and Outreach on Stormwater Impacts, Public Involvement and Participation, Illicit Discharge Detection and Elimination, Construction Site Stormwater Runoff Control, Post-construction Stormwater Management for New Development and Redevelopment, and Pollution Prevention and Good Housekeeping for Municipal Operations.	No
Sec. 2.1.4 - The permittee must conduct an annual review of the SWMP in conjunction with preparation of the annual report required under Part 3.3.	An annual review of the SWMP was conducted in 2016 and will be conducted annually for the remaining permit term.	No

**Area #1. Public Education and Outreach on Stormwater Impacts**

BMP	Status Including Dates & Numeric Measures	Changes?
Sec. 2.2.7.1 - A description of the methods, frequency, type, and target audience of stormwater outreach performed during the permit term.	Informational brochure updated & distributed to GSA & contract personnel involved in building & grounds management, operations & maintenance. Brochure is distributed annually. Target audience is the GSA employees and tenant	Yes

BMP	Status Including Dates & Numeric Measures	Changes?
	agencies that occupy the DFC.	
<u>Sec. 2.2.7.2</u> - A copy or representation of public outreach materials provided to the target audience(s).	See Attachment 2.	Yes
<u>Sec. 2.2.7.3</u> - An estimation of the number of people expected to be reached by the program over each year of the permit term.	Information is distributed via building managers, to the tenant agencies. The estimated daytime population of the DFC is 6,000.	No
<u>Sec. 2.2.7.4</u> - The name or title of the person(s) responsible for coordination and implementation of the stormwater public education and outreach program.	Bill Fieselman,CPG DFC Environmental Programs Group.	No
<u>Storm Drain Catch Basin Marking</u> : Mark storm drain catch basins, as needed.	All storm drain catch basin marking was completed in 2015. Markers are continually replaced when they become weathered or damaged. The record of storm drain marker replacement is kept in the SWMP, Appendix C.	No

**Area #2. Public Involvement and Participation**

BMP	Status Including Dates & Numeric Measures	Changes?
<u>Sec. 2.3.5.1</u> - Documentation of any events or other activities to clean up MS4 receiving waters.	GSA developed a program to evaluate the water quality in McIntyre Gulch as it enters and leaves the DFC. <i>The McIntyre Gulch Surface Water Sediment Monitoring Work Plan</i> was implemented in 2015. Initially, the Baseline Mapping and Channel Characterization tasks were undertaken, followed by monthly stream flow and erosion measurements for 12 months. The results of this mapping and measurement were compiled into the <i>McIntyre Gulch Surface Water Sediment Monitoring, Baseline Mapping and Annual Monitoring Report</i> ,	Yes

BMP	Status Including Dates & Numeric Measures	Changes?
	<p><i>October 2016.</i> This report was provided to EPA for review. EPA plans to use the findings of this report to develop requirements for the next MS4 permit term.</p> <p>Projects have been implemented to determine if constant flow observed in outfalls on the DFC are caused by groundwater intersecting the storm sewer lines, or undetermined discharges from buildings. Also, projects have been implemented to determine if interior building drains are connected to the sanitary sewer system or the storm sewer system in Buildings 45, 50, 55, 56, 57 and 810.</p>	
<p><u>Sec. 2.3.5.2</u> - Documentation of any volunteer activities conducted to help actively engage residents and personnel at the Denver Federal Center in understanding water resources and how their activities can affect water quality.</p>	<p>During the summer months, GSA sponsors a Farmers Market on the DFC one day per week. The Farmers Market is open to the general public as well as all personnel working on the DFC. Periodically, GSA has a booth at the Farmers Market, which is staffed by volunteers, to disseminate pertinent information about the DFC to interested parties. The same information is distributed at the Farmers Market as that described in Section 2.2.7.1 above.</p> <p>GSA also participated in the annual Sustainability Expo held on the DFC campus in June 2016. Information about stormwater on the DFC was disseminated to expo attendees.</p> <p>The documentation of these activities can be submitted to EPA upon request.</p>	<p>No</p>
<p><u>Sec. 2.3.5.3</u> - The name or title of the person(s) responsible for coordination and implementation of the stormwater public education and</p>	<p>Bill Fieselman, CPG DFC Environmental Programs Group</p>	<p>No</p>

BMP	Status Including Dates & Numeric Measures	Changes?
outreach program.		
<p><u>Storm Water Hotline:</u> Maintain and update as necessary, the hotline material and procedures.</p>	<p>The hotline contact phone number has been added to the Stormwater brochure</p>	<p>No</p>

**Area #3. Illicit Discharge Detection and Elimination**

BMP	Status Including Dates & Numeric Measures	Changes?
<p><u>Sec. 2.4.10.1</u> - A description of the program used to detect and eliminate illicit discharges into the MS4; including procedures for detection, identification of sources, and removal of non-stormwater discharges from the storm sewer system.</p>	<p>The BMPs implemented to help detect and eliminate illicit discharges into the MS4 include:</p> <ul style="list-style-type: none"> <li>• Maintain existing storm sewer map.</li> <li>• Plug or reroute floor drains connected to the storm sewer as they are discovered.</li> <li>• Perform annual dry-weather screening survey on storm sewer outfalls for the presence of non-stormwater discharges.</li> <li>• Perform monthly screening survey of outfalls along the Agricultural Ditch for the presence of non-stormwater discharges.</li> <li>• Development of contract language prohibiting non-storm water discharges</li> <li>• Assess non-storm water discharges as they are discovered.</li> </ul> <p>Documentation of these activities can be submitted to EPA upon request.</p>	<p>No</p>
<p><u>Sec. 2.4.10.2</u> - A description of the location and method of dry weather screening performed.</p>	<p>The dry weather screening is performed by physically visiting each stormwater outfall where it discharges to McIntyre Gulch. The screening is normally conducted in August or September of each year, after a minimum of no measurable</p>	<p>No</p>

BMP	Status Including Dates & Numeric Measures	Changes?
	<p>precipitation event 96 hours prior to the screening event. At each outfall, the discharge rate (if any) is measured and dissolved oxygen, conductivity, temperature, pH, salinity and turbidity are measured using portable field instrumentation. Attachment 3 - Dry Weather Screening Results, presents the results of this screening.</p>	
<p><u>Sec. 2.4.10.3</u> - A description of illicit discharges located and all actions taken to eliminate sources of illicit discharges.</p>	<p>DFC is in the process of evaluating the constant flow observed from several of the storm sewer outfalls. It is believed that the storm sewer lines may be encountering the groundwater table and the observed flow is actually groundwater. Investigation into this flow is ongoing at the present time.</p> <p>Also, projects have been implemented to determine if interior building drains are connected to the sanitary sewer system or the storm sewer system in Buildings 45, 50, 55, 56, 57 and 810.</p> <p>At this time there are no other known illicit discharges to the MS4.</p>	<p>No</p>
<p><u>Sec. 2.4.10.4</u> - A description of training materials used and the frequency at which training was provided to the target audience(s) on how to respond to reports of illicit discharges.</p>	<p>Stormwater Management Training consists of a 1 hour video training session and is provided annually. The training can be viewed at the web address shown on page 14 of this annual report. See Attachment 4 for 2016 attendees.</p>	<p>Yes</p>
<p><u>Sec. 2.4.10.5</u> - A description or citation of the established ordinance or other regulatory mechanism used to prohibit illicit discharges into the MS4.</p>	<p>As negotiated between GSA and EPA in the new DFC permit (CO-R 042004), Section 2.4.2 of the permit states: "Effectively prohibit, through regulatory mechanisms available to GSA to prohibit illicit discharges and illegal</p>	<p>No</p>



BMP	Status Including Dates & Numeric Measures	Changes?
	dumping to the MS4 which includes, but is not limited to, notifying EPA and entering into a Federal Facility Compliance Agreements with the federal agencies.” The purpose for this type of regulatory mechanism to prohibit illicit discharges into the MS4 is because GSA has no means of enacting enforcement actions on its tenants (i.e., other government agencies). If illicit discharges are identified by GSA, the responsible party will be required (through contractual methods) to appropriately respond to the discharge. If that party does not respond, EPA will be notified.	
<u>Sec. 2.4.10.6</u> - A copy or excerpt from the information management system used to track illicit discharges.	See Attachment 5. No illicit discharges occurred during the 2016 reporting period.	No
<u>Sec. 2.4.10.7</u> - A description of the categories of non-stormwater discharges evaluated as potentially being significant contributors of pollutants to the MS4 and any local controls placed on these discharges.	DFC is in the process of evaluating the constant flow observed from several of the storm sewer outfalls. It is believed that the storm sewer lines may be encountering the groundwater table and the observed flow is actually groundwater. Investigation into this flow is ongoing at the present time. See response to Section 2.4.10.3, above.	Yes
<u>Sec. 2.4.10.8</u> - A description of the schedule and/or progress in creating a complete storm sewer map in the Denver Federal Center GIS.	A final storm sewer map was completed in August 2015 and revised in June 2016. This map is a living document and is anticipated to be updated on a continuing basis.	Yes

**Area #4. Construction Site Storm Water Control**

BMP	Status Including Dates & Numeric Measures	Changes?
<u>Sec. 2.5.9.1</u> - A description of construction activities which disturbed greater than or equal to 5,000 square feet of land at the DFC during	During the 2016 term of this permit, only one construction activity took place on the DFC that disturbed greater than	No

BMP	Status Including Dates & Numeric Measures	Changes?
the term of this permit.	5,000 square feet of land. The project is the Downing Reservoir project. The Downing Reservoir project is a CDPHE Consent Order remediation of contaminated soils and sediments at a site on the eastern boundary of the DFC. The project is anticipated to be completed in the spring of 2018 and while it will disturb greater than 5,000 square feet of land at the DFC, it is not anticipated to convert greater than 5,000 square feet of land from a permeable to an impermeable surface.	
<p><u>Sec. 2.5.9.2</u> - A description or citation of the established ordinance or other regulatory mechanism used to require erosion and sediment controls.</p>	<p>The GSA Region 8 Stormwater Management Environmental Procedure (See Attachment 6) is included as a requirement in every DFC contract that has the potential to disturb greater than 5,000 square feet of land surface and impact stormwater runoff. The DFC Dig Permit procedure is required for all projects that disturb any amount of soil. As part of this Dig Permit procedure, appropriate erosion control BMPs are also required for soil disturbance of less than 5,000 square feet.</p>	No
<p><u>Sec. 2.5.9.3</u> - A description of the sanctions and enforcement mechanisms the DFC uses to ensure that construction activities disturbing equal to or greater than 5,000 square feet of land are in compliance with the terms of the CGP.</p>	<p>(See Attachment 6) GSA Region 8 Stormwater Management Environmental Procedure. Also, the stormwater runoff controls are included in the contract. For appropriate size contracts the contractor must apply for EPA Notice of Intent (NOI). If the contractor does not comply with contract requirements, a show cause letter or termination of the contract may take place.</p>	No

BMP	Status Including Dates & Numeric Measures	Changes?
<p><u>Sec. 2.5.9.4</u> - A description of the procedures for site plan review, including the review of pre-construction site plans, which incorporate consideration of potential water quality impacts and applicable contract language.</p>	<p>For projects disturbing greater than 5,000 square feet of land surface GSA requires that EISA requirements apply. The entire DFC stormwater flow regime has been modeled to assist with this. When contractors submit design documents to GSA, the design review incorporates evaluation of the MS4/stormwater design. For projects where the design exceeds GSA DFC in-house expertise, an independent third-party is contracted to review the design.</p>	<p>No</p>
<p><u>Sec. 2.5.9.5</u> - A description of the procedures for receipt and consideration of information submitted by the public.</p>	<p>An emergency response hotline (303-236-2911) already exists at the DFC for reporting spills, security issues, or anything else deemed worthy of investigation. GSA EPG personnel educate DFC employees through use of the storm water brochure that the existing hotline can also be used for reporting situations of concern with respect to storm water management at the DFC. When a hotline call is received, security personnel are dispatched to investigate. In addition, security personnel have been instructed to contact GSA EPG personnel regarding any calls received to the hotline that pertain to environmental issues, such as dumping, erosion problems, leaking vehicles, etc. Each call to the hotline is documented and GSA EPG personnel will follow up on each call.</p>	<p>No</p>
<p><u>Sec. 2.5.9.6</u> - A description of the procedures for site inspection, including how sites will be prioritized for inspection, including documentation of the frequency of site inspections and methods for prioritizing site inspections.</p>	<p>GSA personnel have developed procedures to prioritize sites for inspection, and assign responsibility for inspections of construction sites to ensure that contractors are correctly and fully implementing the BMPs in their approved E&amp;SC plans. It</p>	<p>No</p>

BMP	Status Including Dates & Numeric Measures	Changes?
	<p>should be noted that there is usually not enough construction activity taking place at one time to warrant prioritizing their inspection. Rather, inspections are performed on the one (or occasionally more than one) construction site(s), as necessary. Contractors are required to submit all inspection forms as part of their project document deliverables.</p>	
<p><u>Sec. 2.5.9.7</u> - Documentation of annual training provided to contracting office representatives, regarding the maintenance and installation of BMPs for construction stormwater control and the terms of the construction stormwater permit.</p>	<p>See response to Section 2.4.10.4 above. See Attachment 4 for 2016 attendees.</p>	<p>No</p>
<p><u>Sec. 2.5.9.8</u> - The name or title of the person(s) responsible for coordination and implementation of the construction site runoff control program.</p>	<p>Bill Fieselman,CPG DFC Environmental Programs Group.</p>	<p>No</p>

**Area #5. Post-Construction Storm Water Management for New Development and Redevelopment**

BMP	Status Including Dates & Numeric Measures	Changes?
<p>Sec. 2.6.9.1 - A description of the program to ensure that hydrologic endpoints are evaluated for new development and re-development projects as required in Part 2.6.1 and the mechanism used to review the adequacy of permanent stormwater control measures.</p>	<p>(See Attachment 6) - GSA Region 8 Stormwater Management Environmental Procedure (Section 6.3).</p>	<p>No</p>
<p>Sec. 2.6.9.2 - A description of the review procedures and the assumptions provided to ensure the long-term operation and maintenance of permanent stormwater control measures, including an excerpt from any data management system that includes maintenance requirements and schedules for permanent stormwater control measures installed during the year.</p>	<p>(See Attachment 6) - GSA Region 8 Stormwater Management Environmental Procedure (Section 6.3j).</p>	<p>No</p>

BMP	Status Including Dates & Numeric Measures	Changes?
<p>Sec. 2.6.9.3 - A description of the process used to ensure that all DFC contracts initiated after the effective date of the permit contain language which requires the installation of permanent stormwater control measures and an excerpt of applicable contract language.</p>	<p>When a GSA scope of work (SOW) is developed for a project, the Contracting Officer is required to attach all applicable procedures to the SOW. When the project is awarded; the SOW and all attachments become part of the contract requirements. For projects that disturb soil or in any way have the potential to impact stormwater discharge, the GSA Region 8 Stormwater Management Environmental Procedure (See Attachment 6) is included. This process was initiated in 2010 and continues to be updated as needed (latest update is July 2012. Section 6.3 of the Stormwater Management Environmental Procedure discusses construction site stormwater design, runoff control and post construction stormwater management.</p> <p>GSA has no control over contracting performed by other agencies on the DFC.</p>	<p>No</p>
<p>Sec. 2.6.9.4 - A description of any activities to include requirements or planning for permanent stormwater control measures in the natural resource plan.</p>	<p>The DFC does not have a natural resource plan. It does have a sitewide Master Plan which has gone through NEPA review as an EA. This plan documents the future development of the site and includes stormwater control.</p>	<p>No</p>
<p>Sec. 2.6.9.5- -The name or title of the person(s) responsible for coordination and implementation of the post-construction stormwater management program.</p>	<p>Bill Fieselman,CPG DFC Environmental Programs Group</p>	<p>No</p>

**Area #6. Pollution Prevention/Good Housekeeping 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>Sec. 2.7.11.1</u> - A description of the contents and frequency of the training program (see Part 2.7.1) for municipal personnel and a list of the personnel or positions trained during the term of the permit.</p>	<p>The DFC Stormwater Management Training is provided via online video. See the web address shown on page 14 of this annual report. This training is required annually. See Attachment 4.</p>	<p>Yes</p>
<p><u>Sec. 2.7.11.2</u> - A description of the evaluation performed on the street cleaning operations, catch basin cleaning operations, and street sanding/salt practices and any measures taken as a result of the evaluation to minimize negative impacts to water quality.</p>	<p>The DFC grounds maintenance contract was re-competed and awarded during the 2013 permit year. The new contract requires that the contractor:</p> <ul style="list-style-type: none"> <li>• Perform street sweeping of the entire DFC twice per year.</li> <li>• Clean out all storm water catch basins in need of cleaning once per year, with an option to perform a second cleaning per year if needed.</li> <li>• Conduct annual training amongst their employees for street sanding/de-icer application; and pesticide/herbicide application, and</li> <li>• Submit records of the street sweeping and catch basin cleaning events; and the street sanding/de-icer and pesticide/herbicide application training events, to the DFC Contracting Officers Representative (COR), who will provide them to the Environmental Programs Group (EPG) for inclusion in the SWMP and MS4 file documentation.</li> </ul>	<p>No</p>
<p><u>Sec. 2.7.11.3</u> - A description of how maintenance activities are tracked for permanent stormwater control measures.</p>	<p>See response to Section 2.7.11.2, above.</p>	<p>No</p>
<p><u>Hazardous Material Storage:</u> Maintain existing procedures and update, as necessary thereby meeting all RCRA</p>	<p>Maintained and Current. The DFC Hazardous Waste Program was audited by CDPHE in March 2014, with no significant</p>	<p>No</p>

BMP	Status Including Dates & Numeric Measures	Changes?
requirements. Evaluate program effectiveness and plan for the next term.	violations found. Though GSA had all of its paperwork (e.g. manifests) at the conclusion of the inspection, GSA had to acquire a couple of the manifests during the inspection.	
<p><u>Spill Response:</u> Update and maintain both the SPCC plan and the Emergency Response Plan, as necessary. Evaluate program effectiveness and plan for the next term.</p>	<p>The RCRA Emergency Response Procedures document (for the hazardous waste storage areas) was updated in November 2016. The SPCC plan was last updated in November 2011 and was scheduled to be updated in late 2016. However, it is still being developed due to the addition of elevator hydraulic oil tanks and used oil storage in drums. Also, GSA is clarifying the exact responsibility for some specific items in the SPCC.</p>	Yes

Training video web address: <http://www.gsa.gov/portal/content/114575#videoContainer>  
(in the bottom 1/3<sup>rd</sup> of the page click on “Stormwater Training”)

**General Requirements**

BMP	Status Including Dates & Numeric Measures	Changes?
<p><u>3.1.1</u> - Not later than three years from the effective date of this permit, the permittee must develop a program to evaluate the water quality in McIntyre Gulch, as it both enters and leaves the DFC. This program shall at a minimum include evaluations of streambank stabilization, and water quality. The water quality monitoring program may include indicators such as chemical monitoring, assessment of macroinvertebrates or other aquatic life, or watershed assessment of river stability and sediment supply, provided that the monitoring program provides meaningful data to evaluate the effectiveness of the stormwater management program. The permittee is responsible for evaluating data for analysis of trends;</p>	<p>GSA developed a program to evaluate the water quality in McIntyre Gulch as it enters and leaves the DFC. <i>The McIntyre Gulch Surface Water Sediment Monitoring Work Plan</i> was implemented in 2015. Initially, the Baseline Mapping and Channel Characterization tasks were undertaken, followed by monthly stream flow and erosion monitoring measurements for 12 months. The results of this mapping and measurement were compiled into the <i>McIntyre Gulch Surface Water Sediment Monitoring, Baseline Mapping and Annual Monitoring Report, October 2016</i>. This report was provided to EPA for review. EPA plans to use the findings of this report to develop requirements for the next MS4 permit term.</p> <p>Projects have been implemented</p>	Yes

BMP	Status Including Dates & Numeric Measures	Changes?
	to determine if constant flow observed in outfalls on the DFC are caused by groundwater intersecting the storm sewer lines, or undetermined discharges from buildings. Also, projects have been implemented to determine if interior building drains are connected to the sanitary sewer system or the storm sewer system in Buildings 45, 50, 55, 56, 57 and 810.	
3.1.2 - The permittee must send a description of the water quality monitoring program to EPA with the Annual Report for year 3 of this permit term. Programs will be assessed by EPA Region 8 to determine whether the program meets the goals of this permit and whether the data is being collected and reported in compliance with EPA test procedures approved under 40 CFR Part 136; and	See above status.  The work plan described above was submitted to EPA on February 26, 2015. EPA provided minor comments on the work plan and GSA began implementation of the work plan in the fall of 2015. The evaluation and monitoring detailed in the work plan extends through the permit term.	Yes
3.1.3 - The permittee must develop a vision and/or design guidelines for McIntyre Gulch which define how it can be re-configured, conserved, and managed as a high quality receiving water and as an amenity for the Denver Federal Center within 3 years of the effective date of this permit. This could include a vision for how to reconstruct channels to include meanders, drop structures, and to utilize and enhance the function of the existing wetlands. This could also include a vision of how to connect McIntyre Gulch to existing pedestrian corridors or to provide alternative access points so it could be utilized as a recreational amenity for the Denver Federal Center if so desired.	A vision for McIntyre Gulch was developed and submitted with the 2014 MS4 annual report. See Attachment 7.  The results of the McIntyre Gulch study, described above in Section 3.1.1; and the subsequent requirements of the new MS4 permit, may impact the vision for the reaches of the gulch that have not received enhancement in the past.	Yes

**2. Results**

Documentation of information collected and analyzed, during the reporting period can be submitted to EPA upon request.

**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:** 24 DFC Excavation permits with storm water management requirements were issued in 2016. Excavation sites are inspected by EPG personnel or the Custodial Project Manager. When major soil disturbance occurs (1+acre), a Storm Water Pollution Prevention Plan is required and a NOI filed with the EPA. Two NOI's were filed during the 2016 reporting period.

**Area #6. Pollution Prevention/Good Housekeeping BMPs:** The CDPHE audited the DFC Hazardous Waste program in March 2014. GSA received a certificate stating that no significant violations were found.

In April 2016, EPA performed an NPDES MS4 Inspection. Deficiencies noted during the inspection were immediately corrected, if possible. Resolution of the deficiencies that required long-term planning and implementation are ongoing.

#### **4. Proposed Changes to the Storm Water Management Plan.**

Annual review of the DFC SEMS Environmental procedures 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 updated Stormwater Management Plan (SWMP) was submitted to EPA in 2013 and was finalized in 2014. No updates were performed in 2016.

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. However, the storm sewer line down Center Avenue from the old boundary to our new boundary has been retained, as it is one of the DFCs main storm sewer lines. The two 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 impact on the DFC stormwater.

#### **5. Activities for Next Reporting Cycle.** The next reporting cycle will be all of calendar year 2016 and the Annual Report will be due on April 1, 2017. Note that the current permit term expired on November 30, 2016. However, the permit was administratively extended by EPA until they can complete a new 5-year term MS4 permit for the DFC.

##### **Area #1. Public Education and Outreach on Stormwater Impacts**

- **Educational Materials:** Present annual storm water training to DFC building managers and project managers. The DFC Stormwater Management Training is provided via online video. This training video can be viewed at: <http://www.gsa.gov/portal/content/114575#videoContainer> (in the bottom 1/3<sup>rd</sup> of the page click on "Stormwater Training". This training is required annually. Additionally, storm water requirements have been added to the DFC Excavation Permit.

- Distribute DFC Stormwater Informational brochure electronically to all building and project managers so they can forward on to their customers.

**Area #2. Public Involvement and Participation**

- 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**

- 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. Inspect all MS4 storm sewer outfalls existing as of the effective date of the new MS4 permit and determine if there is a discharge and estimate the flow during the inspections.
- 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 Runoff Control**

- 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 Stormwater Management for 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 and Good Housekeeping for Municipal Operations**

- Storm Water Management Training: Conduct annual refresher training for DFC Operations & Maintenance personnel, maintaining written records of training material and attendance in accordance with SEMS requirements. 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.
- Spill Response - Maintain and update existing procedures as needed. Evaluate program effectiveness and plan for next permit term.

**Area #7. General Requirements**

- Based on the results of the *McIntyre Gulch Surface Water Sediment Monitoring Baseline Mapping and Annual Monitoring Report, October 2016*, GSA plans to initiate a feasibility study to determine what kinds of actions can be undertaken to minimize erosion to the gulch. It is GSAs understanding that EPA will outline a series of steps to be performed, during the next MS4 permit term, to address these issues.

**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.

**F. 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
Stephanie Downs	 Director, Colorado Service Center	3-27-17