



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917

<http://www.epa.gov/region8/stormwater>

STORMWATER ANNUAL REPORT FORM

This form is for regulated small MS4s (Municipal Separate Storm Sewer Systems) and may be used to meet the annual reporting requirements for regulated small MS4s as outlined in 40 CFR§122.34g(3). While it is not required for MS4 operators to use this form to meet federal regulations, MS4s are encouraged to use this format to allow for more efficient recordkeeping and to minimize paper consumption.

PLEASE NOTE: This form may not include all of the information required to be submitted in your annual report. Please review your MS4 permit to ensure all required information is reported. Include supplemental pages to this form, if needed.

Completed forms should be mailed to:

Amy Clark
EPA Region 8 Stormwater Coordinator
Mailcode: 8WP-CWW
1595 Wynkoop Street
Denver, CO 80202-1129
Email: clark.amy@epa.gov

All sections of this form must be completed and Item I on Page 18 must be signed and certified.

Please print or type.

A. Permittee Information

Permittee (Agency Name): United States General Services Administration
Public Buildings Service

Mailing Address: DFC Service Center,
1 Denver Federal Center
Building 41
P.O. Box 25546

City, State and Zip Code: Denver, CO 80225-0546

Contact Phone Number: (303) 236-2547

Permit Certification Number: COR042004

Have any areas been added to the MS4 due to annexation or other legal means? NO

B. Reporting Period: Jan 1, 2018 to Dec. 31, 2018.

C. Construction Program Contact:

The following information will be provided on EPA's web site to assist construction site operators in determining municipality-specific requirements for their projects:

Have you assigned an appropriate contact person/work unit to address questions regarding your municipality's construction and post-construction requirements?

If Yes:

Contact name: Bill Fieselman
Position/work group title: Environmental Programs Group Stormwater Manager
Contact phone number: (303) 236-2516
Contact E-mail address: william.fieselman@gsa.gov

If a web site has been created with information on complying with your municipality's construction and/or post-construction requirements, list the address: <http://www.gsa.gov/portal/content/114575>

D. Implementation of EPA's Stormwater Management Program

The purpose of the annual report is to report on the status of your implementation of the permit requirements, including compliance with the standard of reducing the discharge of pollutants from your MS4 to the Maximum Extent Practicable (MEP). Address each of the following items for **each** of the six program areas:

1. Public education and outreach on stormwater impacts;
2. Public participation/involvement;
3. Illicit discharge detection and elimination;
4. Construction site stormwater runoff control;
5. Post-construction stormwater management in new development and redevelopment; and
6. Pollution prevention/good housekeeping for municipal operations

As the permittee, you must collect and maintain adequate information to demonstrate implementation of the six program areas as per your stormwater management program. Note that although the annual report only requires the submittal of certain information as outlined below, additional information may be requested by EPA to audit the implementation of your stormwater management program. For example, construction site inspection reports, outreach materials, and records of maintenance activities performed may be requested by EPA in addition to the annual report.

If another entity does not have its own permit but is instead covered under your permit, the annual report information under Section D of this form must also be provided for each such entity.

1. Public Education and Outreach on Stormwater Impacts

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to a BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for public education and outreach on stormwater impacts for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
Continue an education and outreach program for the DFC which targets project contracting office representatives (CORs), project managers, building/property managers, and environmental staff.	Stormwater Management Training consists of a 1 hour video training session and is provided annually. The training can be viewed at the following web address: http://www.gsa.gov/portal/content/114575	Yes. GSA anticipates that a new MS4 permit will be received in the 1 st half of 2019. Once the new permit is received, GSA plans to develop a new Annual Stormwater Management Training that will be focused on the requirements in the new permit.
Establish a central point of contact for each tenant at the Denver Federal Center for the purposes of communication and training. This should include both the research labs at the DFC and the Army Reserve center.	Central Point of Contact is: DFC Environmental Programs Group. Emergency Hotline: 303-236-2911. John Kleinschmidt, 303-236-2858. Bill Fieselman, 303-236-2516.	No.
Produce and disseminate informational material to contracting officer representatives, project managers, contractors, building and property managers, tenants, and environmental staff of the effects of erosion and runoff on water quality.	Informational brochure updated as needed & distributed to GSA & contract personnel involved in building and grounds management, operations and maintenance. Brochure is distributed annually. Target audience is the GSA employees and tenant agency points of contact. A copy of the informational brochure can be viewed at the following web address: http://www.gsa.gov/portal/content/114575 or a can be submitted to EPA upon request.	No.

<p>Provide annual training to all building managers and tenant points of contact related), to the applicable requirements of the Environmental Management System (EMS the dig permit, and how to report and recognize spills and illicit discharges. This training may be incorporated into a larger program to educate tenants and building managers related to environmental compliance or environmental awareness.</p>	<p>Management of the SEMS has not been the primary job responsibility of any one individual. With the retirement of one of the champions and the reassignment of another, continuous oversight and management of the SEMS has wavered. GSA continues to work on managing the SEMS, at this time the SEMS team is working on stream lining to make it more effective.</p> <p>However, that does not mean that training related to items/issues which impact stormwater hasn't continued. GSA continues to have training related directly to stormwater through on-line training and has had training for new employees and others related to its dig permit process and the sitewide CDPHE Consent Order.</p> <p>Training on the dig permit requirements, which includes a portion on stormwater, is provided at least annually and often more frequent as new project and building managers are hired. In addition, GSA has initiated a PreCon for each project for which a dig permit has been issued to discuss the dig permit and all of its requirements.</p>	<p>No.</p>
<p>Document education and outreach activities in the EMS or other appropriate tracking mechanism (e.g., database or SWMP), including documents created for distribution and training schedule which notes the dates that trainings occurred and the target audiences reached.</p>	<p>Education and outreach activities including the dates that the activities occurred and the attendees are documented in the GSA Region 8 MS4 permit files. Records of specific documentation can be provided upon request.</p>	<p>No.</p>
<p>Within four years of the effective date of this permit, provide and document training to all planning staff and contracting officers to learn about Low Impact Development (LID) practices, green infrastructure practices, and to communicate the expectations for meeting pre-development hydrology within the context of the Energy and Independence Security Act of 2007.</p>	<p>In February of 2015, LID training (<i>Green Infrastructure and Low Impact Development</i>; by Colorado Stormwater Center at Colorado State University) was provided to planning staff, project managers, GSA DFC managers, DFC O&M personnel and DFC environmental staff.</p>	<p>No.</p>

Public Education and Outreach on Stormwater Impacts (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

The GSA DFC Stormwater Program has conducted annual stormwater training directed at project contracting officer representatives (CORs), project managers, building/property managers, and environmental staff. Annual dig permit training has also been provided to project managers, building/property managers. Additionally, the DFC informational brochure has been updated and distributed to GSA & contract personnel involved in building and grounds management, operations and maintenance. GSA plans to revise the annual training program when the new MS4 permit is received in 2019.

2. Public Involvement and Participation

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for public participation and involvement on stormwater impacts for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures.	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
Comply with applicable public notice requirements when implementing a public involvement and participation program.	"Public" with regards to the DFC includes all of the tenant agencies leasing space within the campus. As a result, there are no "applicable public notice requirements" on the DFC. GSA attempts to notify DFC tenant of any stormwater related issues through building manager points of contact within the various agencies, the DFC newsletter, and campus functions, such as the Farmers Market.	No.
Make all relevant annual reports available on the permittee web site or provide links to all relevant annual reports posted on the EPA Region 8 web site in a locally available publication.	The most recent annual report can be viewed at: http://www.gsa.gov/portal/content/114575 Other year's annual reports can be obtained by calling 303-236-2516.	No.

Maintain a log of public participation and outreach activities performed using an appropriate mechanism such as the facility EMS or a Stormwater Management Plan (SWMP).	A log of all public participation and outreach activities is maintained in the GSA DFC MS4 files. Historically, MS4 documentation would be housed in the SEMS. However, due to budget and resource restraints, GSA is streamlining the SEMS, but will continue to store the information in the GSA DFC MS4 files.	No.
When significant additions or modifications are made to the Denver Federal Center's EMS which could impact compliance with the terms of this permit, provide EPA staff the opportunity to review those modifications or additions as necessary.	Due to budget and resource restraints, GSA is streamlining the SEMS. Documentation will continue to be stored in the GSA DFC MS4 files.	Yes.
Documentation of any events or other activities to clean up MS4 receiving waters.	In December 2018, an obstruction was discovered in the sanitary sewer system on the east side of Bldg 810. This caused a sanitary sewer system manhole to overflow into a tributary of McIntyre Gulch on the DFC. Corrective action was taken immediately to prevent further discharge into the gulch. Contaminated material was cleaned up and a containment berm constructed around the manhole to prevent accidental discharge in the future.	Yes.
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.	GSA Region 8 Regional Counsel feels that volunteer activities by federal employees to assist with GSA DFC compliance with the EPA-issued MS4 permit is an improper use of volunteer services and has potential GSA budget augmentation implications. However, many non-volunteer activities are undertaken at the DFC to help engage personnel in understanding how their activities can affect water quality. Such as dissemination of educational materials, presentations at facility-wide events and storm drain stenciling.	No.

Public participation/involvement (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

The main community engagement events for the DFC stormwater program are participation in campus-wide Earth Day events, presentations and distribution of information at the DFC Farmers Market which takes place each Thursday throughout the summer months, distribution of information via the quarterly DFC newsletter and the DFC Facebook page.

3. Illicit Discharge Detection and Elimination

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for illicit discharge detection and elimination for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures.	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
Implement a program to detect and eliminate illicit discharges into its MS4. The program shall include procedures for detection, identification of sources, and removal of non-stormwater discharges from the storm sewer system. This program shall address illegal dumping into the storm sewer system, and include training for staff on how to respond to reports of illicit discharges.	The BMPs implemented to help detect and eliminate illicit discharges into the MS4 include: <ul style="list-style-type: none"> • Maintain existing storm sewer map. • Plug or reroute floor drains connected to the storm sewer as they are discovered. • Perform annual dry-weather screening survey on storm sewer outfalls along McIntyre Gulch and the Agricultural Ditch for the presence of non-- stormwater discharges. • During the first year of the permit performed monthly screening survey of outfalls along McIntyre Gulch for the presence of non-- stormwater discharges. • During the second year of the permit performed monthly screening survey of outfalls along the Agricultural Ditch for the presence of non-- stormwater discharges. • Developed contract language prohibiting non-storm water discharges • Assess non-storm water discharges as they are discovered. Documentation of these activities can be	No.

	submitted to EPA upon request.	
Effectively prohibit, through regulatory mechanisms available to GSA to prohibit illicit discharges and illegal 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.	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 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.	No.
Provide a mechanism for reporting of illicit discharges and provide this number on any outreach materials as appropriate.	The DFC Emergency Hotline (303-236-2911) can be used to report illicit discharges, as well as contacting the DFC Environmental Programs Group (EPG) Manager (303-236-2858) or the DFC Stormwater Manager at (303-236-2516). This information is also provided on all outreach materials.	No.
Provide emergency spill contact information to all building managers, project managers, and the appropriate tenant single point of contact.	Spill Prevention, Control, and Countermeasure (SPCC) training, which includes emergency spill contact information, is provided to all GSA DFC building managers and project managers. Emergency spill contact information is also provided in the Stormwater Informational Brochure. The brochure is provided to building managers who distribute it to their appropriate tenant points of contact.	No.
Investigate any illicit discharge within fifteen (15) days of its detection, and take action to eliminate the source of the discharge within forty five (45) days of its detection (or obtain permission from EPA for such	Upon detection of an illicit discharge, it is DFC EPG protocol to investigate immediately. Investigation into the source of an illicit discharge starts within the 15 day requirement and stopping the discharge also occurs within in this time frame. Action is taken to eliminate the source of the discharge as soon as possible, but	No.

<p>longer periods as may be necessary in particular instances).</p>	<p>is funding dependent. If eliminating the source requires significant funding; the project is placed on a list and prioritized based other needs of the facility. This is often longer than 45 days.</p> <p>An example is the 2018 illicit discharge of sewage waste from Building 810. GSA corrected the problem immediately (e.g., stopped all discharge from the building), then continued to investigate the cause to eliminate further illicit discharge when sewage discharge from the building was resumed.</p> <p>To complete the final remedy to the problem, GSA had to request funds. Due to the location and sensitive nature of the problem within a wetland, funding was obtained quickly.</p> <p>However, GSA had to await approval of the US COE 404 permit to complete the final remedy.</p> <p>EPA shall be notified when eliminating the source of the discharge is anticipated to be greater than 45 days.</p>	
<p>Maintain an information system which tracks dry weather screening efforts, illicit discharge reports, and the location and any remediation efforts to address identified illicit discharges.</p>	<p>Dry weather screening efforts, illicit discharge reports, and the location and any remediation efforts to address identified illicit discharges are maintained on the GSA Region 8 DFC MS4 files.</p> <p>Documentation of these activities can be submitted to EPA upon request.</p>	<p>No.</p>

<p>Conduct dry weather screening annually at each of the major outfalls for the presence of non-stormwater discharges and to determine if there are significant erosion issues which need to be addressed. This requirement can be fulfilled by complying with Part 1.3.3. If an illicit discharge is detected, an assessment of that discharge shall be made. For example, sampling could include field tests of selected chemical parameters as indicators of discharge sources where dry weather flows are detected. Screening level tests may utilize less expensive "field test kits" using test methods not approved by EPA under 40 CFR Part 136, provided the manufacturer's published detection ranges are adequate for the illicit discharge detection purposes.</p>	<p>GSA inspected all MS4 storm sewer outfalls along McIntyre Gulch once a month for the first year of this permit. GSA also inspected all storm sewer outfalls along the Agricultural Ditch once a month for the second year of this permit. GSA conducts dry weather screening annually at outfalls for the presence of non-stormwater discharges and to determine if there are significant erosion issues. Documentation of these activities can be submitted to EPA upon request.</p>	<p>No.</p>
<p>Address the categories of non-stormwater discharges or flows listed in Part 1.3.2 and require local controls or conditions on these discharges as necessary to ensure that they are not significant contributors of pollutants to the small MS4. If the permittee identifies any of these non-stormwater discharges as a significant contributor of pollutants, the permittee must include the category as an illicit discharge and implement a plan of action to minimize or eliminate the illicit discharge as soon as practicable.</p>	<p>Categories of non-stormwater discharges or flows listed in Part 1.3.2 have been evaluated across the DFC campus and to date, determined to not be significant contributors of pollutants to the MS4.</p>	<p>No.</p>
<p>Update the complete storm sewer system map in the Denver Federal Center GIS prior to the end of year three of the permit.</p>	<p>The DFC storm sewer system map was updated in 2016. Updates are made to the map as changes in the system occur.</p>	<p>No.</p>

<p>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"> • Maintain existing storm sewer map. • Plug or reroute floor drains connected to the storm sewer as they are discovered. • Perform annual dry-weather screening survey on storm sewer outfalls for the presence of non--stormwater discharges. • Perform annual dry-weather screening survey screening survey of outfalls along the Agricultural Ditch for the presence of non--stormwater discharges. • Development of contract language prohibiting non-storm water discharges • Assess non-storm water discharges as they are discovered. <p>Documentation of these activities can be submitted to EPA upon request.</p>	<p>No.</p>
<p>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 and the Agricultural Ditch. The screening is normally conducted in September-November of each year, after a minimum of no measurable 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. Documentation of these activities can be submitted to EPA upon request.</p>	<p>No.</p>
<p>A description of illicit discharges located and all actions taken to eliminate sources of illicit discharges.</p>	<p>DFC has investigated the constant flow observed in three of the storm sewer outfalls. In all three outfalls building footing drains (allowable non-stormwater discharge) were found to be contributing flow to the storm sewer lines. The report detailing this investigation can be provided to EPA upon request.</p> <p>Also, projects have been implemented to determine if interior building drains are connected to the sanitary sewer system or</p>	<p>Yes.</p>

	<p>the storm sewer system in Buildings 45, 50, 55, 56, 57 and 810. Work on these projects is ongoing</p> <p>At this time there are no other known illicit discharges to the MS4.</p>	
<p>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 this web address: http://www.gsa.gov/portal/content/114575</p> <p>Documentation of the 2018 attendees can be submitted to EPA upon request.</p>	No.
<p>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 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.</p>	No.
<p>A copy or excerpt from the information management system used to track illicit discharges.</p>	<p>The only illicit discharge identified during this reporting period was in December 2018, when an obstruction was discovered in the sanitary sewer system on the east side of Bldg 810. This caused a sanitary sewer system manhole to overflow into an unnamed tributary of McIntyre Gulch on the DFC. The appropriate section of the sanitary sewer was shut down immediately and corrective action was taken to prevent further discharge from the manhole into the gulch. Contaminated material was excavated and disposed, and a containment berm was constructed around the manhole to prevent accidental discharge in the future.</p> <p>Documentation can be submitted to EPA upon request.</p>	Yes.

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 has investigated the constant flow observed in three of the storm sewer outfalls. In all three outfalls building footing drains (allowable non-stormwater discharge) were found to be contributing flow to the storm sewer lines. These discharges are not potential significant contributors of pollutants because building operations are not tied to the building footing drains and the buildings are not located within the area of a contaminated groundwater plume. The report detailing this investigation can be provided to EPA upon request.	No.
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 will be updated on a continuing basis.	No.

Illicit Discharge Detection and Elimination (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

Upon detection of an illicit discharge, it is DFC EPG protocol to investigate immediately. Investigation into the source of an illicit discharge starts within the 15 day requirement and stopping the discharge also occurs within in this time frame.

Action is taken to eliminate the source of the discharge as soon as possible, but is funding dependent. If eliminating the source requires significant funding; the project is placed on a list and prioritized based other needs of the facility. This is often longer than 45 days. EPA shall be notified when eliminating the source of the discharge is anticipated to be greater than 45 days. The DFC storm sewer system map was updated in 2016. Updates are made to the map as changes in the system occur. A copy of the map can be provided upon request.

4. Construction Site Stormwater Runoff Control

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for construction site stormwater runoff control for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
Maintain a list of policies and procedures which can be used to enforce construction site compliance within the DFC. This may include working with the City of Lakewood and utilizing the EPA for enforcement of construction stormwater violations.	GSA maintains two policies to enforce construction site compliance. The GSA Region 8 Stormwater Management Environmental Procedure is included as a requirement in every DFC contract that has the potential to disturb soil. The DFC Dig Permit contains procedures that are required for all projects that disturb any amount of soil. Documentation of these procedures can be submitted to EPA upon request.	No.
Use available regulatory mechanisms under the authority of the permittee to require erosion and sediment controls with sanctions for compliance to ensure compliance with the terms of the NPDES General Permit for Stormwater Discharges for Construction Activity in Colorado, COR10000F (i.e., the Construction General Permit or "CGP").	By requiring that the GSA Region 8 Stormwater Management Environmental Procedure is included in DFC contracts, it allows GSA to ensure compliance via a contract requirement.	No.
Create a general plan for inspection and enforcement of construction site stormwater BMPs which specifies any appropriate sanctions, penalties, enforcement procedures and inspection schedules.	GSA personnel have developed procedures to inspect construction sites to ensure that contractors are correctly and fully implementing the BMPs in their approved S&EC plans. Additionally, contractors are required to submit all of their own inspection forms as part of their project document deliverables.	No.
Review the scope of work for all construction projects by environmental staff (e.g., the EPG) to assess whether proposed BMPs are realistic and to ensure compliance with the stormwater construction permit requirements for developing a stormwater pollution prevention plan.	GSA Region 8 Office of Facilities Management (OFM) reviews plans and specifications on all construction projects on the DFC. These OFM reviews include EPG personnel who review the projects to ensure compliance with the stormwater permit requirements and the SWPPP.	No.

<p>Provide information on construction site BMPs with criteria for maintenance and installation. This may reference or incorporate documents which define how to install and maintain BMPs such as the Urban Drainage and Flood Control District Criteria Manual.</p>	<p>As part of the OFM plan reviews discussed above, information and suggestions are provided on the installation and maintenance of BMPs.</p>	<p>No.</p>
<p>Maintain and utilize a closure process whereby environmental staff (e.g., the EPG) or contracting office representatives who are knowledgeable and have expertise in the area of stormwater management evaluate whether 70% vegetative cover has been met at all areas of the site prior to closing out construction stormwater permits. This process could be incorporated into the dig permit process.</p>	<p>In instances where areas of a construction site require evaluation as to whether 70% vegetative cover has been met prior to closing out construction stormwater permits, GSA will contract a 3rd party landscape professional to perform the evaluation. When possible, this requirement is incorporated into the dig permit for the project.</p>	<p>Yes.</p>
<p>Provide training to contracting office representatives which perform daily inspections on a biannual basis regarding the maintenance and installation of Best Management Practices for construction stormwater control and the terms of the construction stormwater permit.</p>	<p>BMP inspection and maintenance training is provided to EPG personnel who perform inspections of the BMPS specified in the construction stormwater permits.</p>	<p>No.</p>
<p>Consider requiring emergency response BMPs or other equipment available in the back of response trucks to prevent the flow of sediment laden or contaminated water from reaching storm drains, since the DFC plays a role as a first responder in dealing with stormwater emergencies.</p>	<p>Equipment, including absorbent and spill kits are available in the truck used by EPG personnel. Additionally, spill kits and inlet covers are stationed at numerous locations throughout the campus, including emergency generator locations.</p>	<p>No.</p>

<p>A description of construction activities which disturbed greater than or equal to 5,000 square feet of land at the DFC during the term of this permit.</p>	<p>During the 2018 term of this permit, only one construction activity took place on the DFC that disturbed greater than 5,000 square feet of land. The project is to convert an existing warehouse building into data center. Remodeling of this building requires additional parking and fire equipment access roads. Therefore, greater than 5,000 square feet of land will be converted from a permeable to a non-permeable surface. Project design includes construction of two bio-retention basins to manage stormwater from the additional non-permeable surfaces. The bio-retention basins will be added to the inventory of permanent BMPs on the DFC. The project is anticipated to be completed by fall 2019.</p>	<p>Yes.</p>
<p>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 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. Documentation of these procedures can be submitted to EPA upon request.</p>	<p>No.</p>
<p>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>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>	<p>No.</p>

<p>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 be met. 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>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>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 S&EC plans. It 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>No.</p>

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.	Stormwater Management Training consists of a 1 hour video training session and is provided annually. The training can be viewed at this web address: http://www.gsa.gov/portal/content/114575 Documentation of the 2018 attendees can be submitted to EPA upon request.	No.
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Construction Site Stormwater Runoff Control (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

GSA Region 8 Office of Facilities Management (OFM) reviews plans and specifications on all construction projects on the DFC. These OFM reviews include EPG personnel who review the projects to ensure compliance with the stormwater permit requirements and the SWPPP.

The GSA Region 8 Stormwater Management Environmental Procedure 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 is required.

For projects disturbing one or more acres, contractors must obtain coverage under the 2017 Construction General Permit (CGP) and are responsible for submitting a Notice of Intent (NOI) and Notice of Termination (NOT).

GSA EPG personnel inspect construction sites to ensure that contractors are correctly and fully implementing the BMPs specified in dig permits or CGPs.

5. Post-construction Stormwater Management in New Development and Redevelopment

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for post-construction stormwater management in new development and redevelopment for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted.	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
<p>Include in contracts and requests for funding (e.g., a "prospective package") a requirement to design for and provide funding for the installation of permanent stormwater control measures designed to retain, detain, infiltrate or treat runoff from newly developed impervious surfaces in a manner which mimics pre-development hydrology for all new projects and redevelopment which disturb greater than or equal to 5,000 square feet. Pre-development hydrology is defined in the SWMP. This should include a line item for costs associated with the installation and design of permanent stormwater control measures along with a specific performance specification (i.e., maintaining pre-development hydrology) or BMP specification.</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.</p> <p>Of these contract requirements, the GSA Region 8 Sustainability & Environmental Management System (SEMS) - Stormwater Management Environmental Procedure (Section 6.3) discusses construction site stormwater design, runoff control and post construction stormwater management.</p> <p>This process was initiated in 2010 and continues to be updated as needed.</p>	<p>No.</p>
<p>As part of the design review process for new and redeveloped construction projects disturbing equal to or greater than 5,000 square feet, review all contracts to ensure that they include permanent post-construction stormwater control measures designed to retain, detain, infiltrate, or treat runoff from newly developed and redeveloped impervious surfaces in a manner which mimics pre-development hydrology.</p>	<p>See Status directly above.</p> <p>Also, GSA Region 8 Office of Facilities Management (OFM) personnel review plans and specifications on all construction projects on the DFC. These OFM reviews include EPG personnel who ensure the projects compliance with stormwater control measures.</p>	<p>No.</p>
<p>Include or reference in the dig permit, applicable requirements and available guidance to design post-construction stormwater features or low impact development practices designed to mimic pre-development hydrology.</p>	<p>Dig permits are prepared on a site/project specific basis. When post-construction stormwater features or low impact development practices are pertinent to the site/project, applicable requirements and available guidance is included in the dig permit.</p>	<p>No.</p>

<p>When updated, include hydrologic performance specifications and information related to the design and maintenance of permanent stormwater control measures in natural resource plans.</p>	<p>The DFC does not have a natural resource plan. However, in 2009, GSA contracted development of a SWMM model for the entire DFC facility. The purpose was to evaluate the existing system for predevelopment hydrology (for EISA compliance purposes), for use by construction projects taking place at that time, and for contractors use in future development projects. This hydrologic information has not been updated since that time.</p>	<p>No.</p>
<p>Develop and maintain a system to track the location, design, and maintenance specifications of permanent stormwater features. This could be incorporated into a GIS system or other internal process such as the Facilities Maintenance Plan or the Denver Federal Center EMS and include post-construction BMP "as-builts" for all newly installed permanent stormwater control measures in a georeferenced data management system.</p>	<p>Information on the location, design, and maintenance specifications and "as-builts" (when available) of permanent stormwater features are maintained in the GSA Region 8 project files and the MS4 permit files. Documentation of these records can be submitted to EPA upon request.</p> <p>For the next permit term, GSA plans to incorporate the location and maintenance specifications and maintenance tracking of permanent stormwater features into MAXIMO. MAXIMO is a Computerized Maintenance Management System (CMMS) utilized by GSA Public Buildings Service (PBS) to manage the maintenance requirements of their properties.</p>	<p>Yes.</p>
<p>Ensure that all newly installed post-construction stormwater control measures are working as designed prior to closing out contracts.</p>	<p>All newly installed post-construction stormwater control measures, installed as part of a projects design, are required to go through a prove-out period per the projects contract requirements. Documentation of this is included within the specific projects contract closeout documentation.</p>	<p>No.</p>
<p>Upon closeout of new construction projects, include maintenance requirements for newly installed permanent post-construction stormwater control measures into a long-term maintenance plan.</p>	<p>Currently, long-term maintenance of permanent post-construction stormwater control measures is managed by inspecting the measure annually, if problems are identified, GSA contracts to have the appropriate maintenance or repair performed.</p> <p>For the next permit term, GSA plans to incorporate maintenance of permanent stormwater features into</p>	<p>No.</p>

	MAXIMO. See description of MAXIMO above.	
Ensure that permanent post-construction stormwater control measures are included in any applicable warranty reviews.	Most of the permanent post-construction stormwater control measures on the DFC are too old to have any remaining warranties (Ponds 1, 2 and 3, Bldg. 810 retention basin, etc.). The pervious concrete parking lot and the porous asphalt parking lot were installed as demonstration areas and there were no warranties with these areas.	No.
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.	The GSA Region 8 Sustainability & Environmental Management System (SEMS) - Stormwater Management Environmental Procedure (Section 6.3) provides this description. Documentation of this procedure can be submitted to EPA upon request.	No.
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.	The GSA Region 8 SEMS - Stormwater Management Environmental Procedure (Section 6.3j) provides this description. Documentation of this procedure can be submitted to EPA upon request.	No.
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.	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 SEMS - Stormwater Management Environmental Procedure (Section 6.3) 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	No.

	<p>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>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>	No.

Post-construction Stormwater Management in New Development and Redevelopment (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

GSA EPG conducts annual inspections of permanent stormwater BMPs on the facility. These inspections help determine the performance of the BMP and the need for maintenance activities. BMPs that require maintenance or repair are referred to the DFC Road and Grounds Team who contract with one of the facility operation and maintenance contractors for the necessary services.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

Provide the status of any measurable goal scheduled for completion during the reporting period or for which activities have begun. For program elements started, but not completed, any milestones that have been met must be indicated. If a change will be proposed to the BMP or measurable goal as part of the annual report, this must be stated and the proposed changes discussed. For each change proposed, you must provide information on:

1. The BMP/Measurable goal for which a change is proposed;
2. Any proposed changes to the BMP description;
3. Any proposed changes to the measurable goals (including specific dates and measures); and
4. The rationale for the proposed changes.

Describe any measurable goal(s) for pollution prevention/good housekeeping for municipal operations for the reporting period; including dates and numeric measures:

Measurable Goal(s) Including dates and numeric measures, as previously submitted	Status: Including dates and numeric measures	Changes proposed to BMP and/or Measurable Goal? (Yes/No). If yes, provide information on proposed changes and rationale.
<p>Develop and implement an operation and maintenance program with the ultimate goal of preventing and reducing pollutant runoff from</p>	<p>Two DFC personnel that assist with management of the DFC stormwater program attended the Colorado Stormwater Center's Permanent BMP Inspection and</p>	No.

<p>municipal operations which includes an employee training component.</p>	<p>Maintenance training on April 19-20, 2017, and subsequently passed the certification exam.</p> <p>The Permanent Stormwater Quality Best Management Practice Inspection and Maintenance Field Guide, developed by the Colorado Stormwater Center at Colorado State University, has been distributed to the GSA DFC Road and Grounds Team, and both of the DFC operation and maintenance (O&M) contractors.</p> <p>The DFC Road & Grounds Contractor is under contract to perform snow removal, street sweeping, pesticide/herbicide application, and storm sewer system maintenance and cleaning. Their contract also requires that they train their personnel in stormwater runoff impacts and controls and the maintenance of onsite pollution control measures; correct application of chemical deicers and strategies to prevent the misuse and over-application of chemical deicers; and pesticide/herbicide application and management.</p> <p>GSA began performing inspections of the permanent BMPs on the DFC (Ponds 1, 2 and 3; a retention pond north of the northeast corner of Building 810; and the infiltration gallery along the north side of the USAR building). The Department of State performs inspection of the underground infiltration system for their building and provides the inspection records to GSA.</p> <p>Any problems with the BMPs identified during the inspection are reported to the GSA DFC Road and Grounds Team, who direct the DFC O&M contractors to perform the necessary repairs.</p>	
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<p>Provide and document annual training for all grounds maintenance and facilities maintenance contractors on an annual basis covering the topics of stormwater runoff impacts and controls and the maintenance of onsite pollution control measures. These trainings can be provided to a single point of contract for each facility for further distribution.</p>	<p>Annual stormwater training for grounds and facilities maintenance contractors is provided on an annual basis. Documentation of this training can be submitted to EPA upon request.</p>	<p>No.</p>
<p>Conduct an annual snow meeting at the beginning of each year to discuss strategies to prevent the misuse and over-application of chemical deicers.</p>	<p>Grounds maintenance contractors conduct annual training during the fall to discuss appropriate use of chemical deicers. The contractors provide this documentation to their government point of contact (DFC Road & Grounds Team [R&GT]), who then forwards the records to the stormwater manager. Documentation of this training can be submitted to EPA upon request.</p>	<p>No.</p>
<p>Conduct an annual street sweeping and storm sewer system maintenance meeting or training to discuss procedures for disposing of material and priorities/schedules for cleaning out stormwater BMPs and street sweeping.</p>	<p>Grounds maintenance contractors conduct street sweeping twice per year. They also conduct annual stormwater inlet inspections, and cleaning if necessary. The contractors provide this documentation to their government point of contact (R&GT), who then forwards the records to the stormwater manager. Documentation of this training can be submitted to EPA upon request.</p>	<p>No.</p>
<p>Inventory the DFC for locations of all stormwater features such as detention basins, drop structures and trash racks. Where these facilities are noted, provide a schedule for their inspection and procedures for when these need to be cleaned out and/or modified. Include these activities in maintenance contracts, specifications for maintenance of instream BMPs (sediment basins, drop structures, trash racks).</p>	<p>GSA stormwater personnel have inventoried and perform annual inspections of the permanent BMPs on the DFC. Any problems with the BMPs identified during the inspection are reported to the R&GT, who direct the DFC O&M contractors to perform the necessary repairs. Documentation of these inspections can be submitted to EPA upon request.</p>	<p>No.</p>

<p>Develop and implement a schedule for cleanout of storm sewer inlets in a manner which prevents significant deposition of sediment or other debris to receiving waters.</p>	<p>Grounds maintenance contractors conduct annual stormwater inlet inspections, and cleaning if necessary in the spring of each year. The contractors provide this documentation to their government point of contact (R&GT), who then forwards the records to the stormwater manager.</p>	<p>No.</p>
<p>Provide the grounds contractors or other parties responsible for pesticide and herbicide application with training related to the requirements for NPDES permitting (given the requirements in EPA's new pesticide application general permit) and in the area of chemical disposal and stormwater runoff at least once during the effective term of this permit.</p>	<p>Grounds maintenance contractors conduct annual training to discuss appropriate application and disposal of excess pesticides and herbicides. The contractors provide this documentation to their government point of contact (R&GT), who then forward the records to the stormwater manager. Documentation of this training can be submitted to EPA upon request.</p>	<p>No.</p>
<p>Track pesticide and herbicide records for each site for each chemical. Contractors should keep a daily log in a format which can be provided for assessment by the Environmental Programs Group or other entities if necessary.</p>	<p>Grounds maintenance contractors track pesticide and herbicide application, as it is applied. The contractors provide this documentation to their government point of contact (R&GT), who makes these records available to other entities as requested.</p>	<p>No.</p>
<p>Evaluate the activities at the Army Reserve Unit to determine whether industrial permitting is necessary.</p>	<p>The Elmer E. Fryar US Army Reserve Center (USARC) (CO004), at the northeast corner of the DFC submits and maintains their own No Exposure Certifications (NECs).</p>	<p>No.</p>

<p>Consider adding specifications for use in construction project re-vegetation or for use in training materials related to procedures related to the application of pesticides and herbicides. Such specifications would specify procedures for disposing of excess chemical residuals, procedures for storage and maintenance of herbicides and pesticides, maintenance of MSDS's for all herbicides/pesticides used, use of backflow protection systems to prevent contamination of domestic water sources, procedures for routing water and chemical residuals away from storm drains, and any applicable requirements as prescribed in the dig permit.</p>	<p>Only one grounds maintenance contractor applies pesticides and herbicides on the DFC. Application training and record keeping is discussed above.</p>	<p>No.</p>
<p>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>Stormwater Management Training consists of a 1 hour online video training session and is provided annually. The training can be viewed at this web address: http://www.gsa.gov/portal/content/114575 Documentation of the 2018 attendees can be submitted to EPA upon request.</p>	<p>No.</p>
<p>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 requires that the contractor:</p> <ul style="list-style-type: none"> • Perform street sweeping of the entire DFC twice per year. • 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. • Conduct annual training amongst their employees for street sanding/de-icer application; and pesticide/herbicide application, and Submit records of the street sweeping and catch basin cleaning events; and the street sanding/de-icer and pesticide/herbicide application training events, to their government point of contact (R&GT), who then forwards the records to the stormwater manager. <p>Documentation of this training can be submitted to EPA upon request.</p>	<p>No.</p>

<p>A description of how maintenance activities are tracked for permanent stormwater control measures.</p>	<p>Currently, stormwater control measures are managed by inspecting the measure at least annually. If problems are identified, GSA contracts to have the appropriate maintenance or repair performed.</p> <p>For the next permit term, GSA plans to incorporate maintenance of stormwater features into MAXIMO. See description of MAXIMO above.</p>	<p>Yes.</p>
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Pollution Prevention/Good Housekeeping for Municipal Operations (continued)

Narrative description. Provide any descriptions which may further describe the implementation of this minimum measure. Such narrative may include descriptions of efforts which overlap several minimum measures or descriptions of documents or programs which have been created in an effort to implement this minimum measure:

<p>GSA DFC utilizes a combination of education/training, inspections and grounds maintenance contractor’s contract requirements to achieve pollution prevention and good housekeeping.</p> <p>Also, since 2015, GSA has been conducting a McIntyre Gulch water quality monitoring and corrective measures project. The purpose of this ongoing project is to determine flow characteristics of the gulch, identify area of particular concern with regard to erosion and sediment control, and develop a prioritized list of projects. Projects on this list will be implemented, as funding is available, to minimize bank erosion and prevent sediment accumulation within the gulch flow regime on the DFC campus.</p>

E. Results of Information Collected and Analyzed.*

If you have collected and/or analyzed information during the reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants, submit a short summary of the information and any analysis completed.

<p>Measurable Goal</p>	<p>Results of information collected and analyzed that must be reported for this item</p>
<p>MS4 Annual Water Sampling</p>	<p>GSA spent the first year of this MS4 permit term determining the outfalls that discharge non-stormwater (continuous flow) to McIntyre Gulch. Beginning with the second year of this permit, GSA has sampled the four outfalls with continuous flow (out of 13 total outfalls) for the parameters listed in Section 1.3.3.1 of the MS4 permit. These samples are collected annually in August of each year. Results are compared to water quality parameters to determine if there is a potential impact to the McIntyre Gulch receiving water.</p> <p>Additionally, visual inspections are performed along the entire reach of the gulch on the DFC campus, during the annual dry-weather outfall survey conducted during the fall of each year.</p>

*Data collected to audit the implementation status of a program element does not need to be reported in the annual report unless required by an established measurable goal or as a requirement or result of an inspection or enforcement action. For example, data such as street miles swept, visitors at an information booth, or visits to a web site do not need to be included in the annual report unless directly related to a measurable goal or committed to be reported and/or analyzed in a program

description.

F. Summary of Inspections and Enforcement Actions.

Provide a summary of the number and nature of inspections and formal enforcement actions performed. Site-specific information may also be included, but is not required.

Program Area	Description of Enforcement Actions/ Inspections
Construction General Permit – Construction Stormwater Inspections	<p>Downing Reservoir Corrective Measure – remediation and re-construction of the Downing Reservoir area on the DFC. The project contractor, who obtained coverage under the CGP, performed stormwater inspections on a weekly basis during the duration of the project. Inspection records were provided to GSA in the project close-out report. The contractor plans to submit a NOT in the first quarter of 2019.</p> <p>Inspections were also performed by EPG personnel during this project.</p> <p>Building 94 Remodel Project – Project began in May 2018. The project contractor obtained coverage under the CGP, and has performed stormwater inspections on a weekly basis. The project continued into 2019. Inspections were also performed by EPG personnel during this project.</p> <p>No formal enforcement actions were performed during these projects.</p>

G. Proposed Changes to the Stormwater Management Program.

Provide a narrative description of any changes or additions to the stormwater management program.

<p>Following renewal of the DFC MS4 permit, GSA Region 8 plans to:</p> <p>Revise the SWMP to address renewed permit requirements and eliminate items in the existing SWMP that are not applicable.</p> <p>Develop a new annual stormwater training program.</p> <p>Modify the annual outfall sampling program, as directed by the renewed MS4 permit.</p> <p>Re-evaluate the use of the Sustainability and Environmental Management System (SEMS) to store and track MS4 permit files.</p> <p>Incorporate the use of MAXIMO to track operation and maintenance of existing and new post- construction stormwater control measures.</p> <p>Begin implementing, as funding is obtained, erosion and sediment control projects developed during the McIntyre Gulch water quality, corrective measures and stream stabilization studies.</p>
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H. Notice of Program Element Operation by a Second Party.

Another government entity may be relied on to perform requirements of your MS4 permit. However, as the permittee, you remain liable for compliance with the terms of the permit if the requirements are not fulfilled. You must complete this annual report for the geographic areas covered under your permit, for all program areas, even if one or more program elements/areas is being performed by another entity. (However, if you are performing a program element for another permittee, you do not need to include that activity in this report.) If you are relying on another government entity to satisfy some of your permit obligations (and if the information has not been previously provided to the EPA in earlier reports or the application), the annual report must include a statement to that effect. If the BMP and/or measurable goal will be modified in addition to the change of operator to another government entity, the change must be included in Item G, above. Example statement: "As of September 15, 2003, Monroe County is performing the construction site plan reviews for the Nixon Air Force Base in accordance with the procedures in the Base's original application."

Not Applicable.

I. 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."

 3-26-19

Signature of Permittee (legally responsible person)**

Date Signed

Stephanie G Downs Director, Colorado Service Center

Name (printed)

Title

**This report may be signed by a duly authorized representative of the permittee in conjunction with the signatory requirements for NPDES permitting provided at 40 CFR§122.22(b).