



U.S. Department of Justice  
Federal Bureau of Prisons  
U. S. Medical Center for Federal Prisoners  
P. O. Box 4000

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Springfield, MO 65801-4000

May 13, 2013

MEMORANDUM FOR CHARLES Greeson, Environmental Specialist

FROM:

  
Elmer Harris, ESCA/CESCO  
USMCFP SPRINGFIELD, MO.

SUBJECT:

**MSTORM WATER PERMIT R040066**



Attached is the 2013 application for renewal of Missouri Storm Water Management Permit #R040066 for the United States Medical Center for Federal Prisoners located at 1900 West Sunshine St. Springfield, Missouri.

Please address any questions or concerns to (417)-874-1676 or [erharris@bop.gov](mailto:erharris@bop.gov).



U.S. Department of Justice  
Federal Bureau of Prisons



## PROCEDURE GUIDELINES

OPI            Safety  
DATE         January 22, 2013

### STORM WATER MANAGEMENT MS4 PERMIT

/s/  
Approved: M. Stewart, AW Operations  
USMCFP Springfield

1. **PURPOSE AND SCOPE:** To provide guidelines for identifying environmental hazards and implementing training requirements to protect the environment. To assure that proper procedures and safeguards are implemented where hazards are present. This procedure provides a means of expedient correction of environmental impact hazards, hazardous spills, illicit discharges, and environmental impact notification reported by staff, inmates, and or contractors.
2. **DIRECTIVES AFFECTED:**
  - a. DIRECTIVES RESCINDED: **STORM WATER MANAGEMENT MS4 PERMIT dated August 10, 2010**
  - c. DIRECTIVES REFERENCED:
    - (1) P 1600.09, Occupational Safety, Environmental Compliance and Fire Protection.
    - (2) P 1600.10, Environmental Management Systems.
    - (3) EPA Standards 40 CFR, Clean Water Act
    - (4) MODNR Regulations. 10 CSR 20-6.010
    - (5) Environmental Regulations TRM 016.01.
    - (6) PS 4200.10, Facilities Operations Manual.
    - (7) **10 CSR 20-6.200**
3. **STANDARDS REFERENCED: 10 CSR 20-6.200**
4. **PERMITTING:** Currently USMCFP Springfield is permitted by the state of Missouri Department of Natural Resources as a General Regulated Small Municipal Separate Storm Water System. Permit Number MO-R040066 dated June 15, 2009. Current permit expires on June 13, 2013.
5. **STORM WATER ANNUAL REPORTING FOR SMALL MS4 GENERAL PERMIT**

The annual storm water report is due to the Missouri Department of Natural Resources Storm Water Program Coordinator in the Water Control Branch no later than

**July 28** annually. Sampling test results and updates to the Best Management Practices including the following topics must be included as attachments: Construction, Housekeeping, Illicit Discharge Detection and Elimination, Post Construction, Public Education, and Outreach.

6. **STORM WATER INTAKES & EFFLUENT LABELING:**

The storm water intakes will be labeled as such. "No Dumping - Drains to Creek" This will advise staff, inmates, contractors, and visitors to protect from illicit discharges in these areas. The storm water effluent discharges will be numbered accordingly, and labeled as such. The current storm water map will be updated on an as needed basis as a result of additional construction changes.

7. **INSPECTIONS: MONTHLY, QUARTERLY, ANNUALLY**

- a. The Safety Department will conduct monthly inspections of the facilities INFLECT and effluent storm water conveyances to identify illicit discharges. MODNR defines an Illicit Discharge as any discharge to a municipal separate storm sewer that is not composed entirely of storm water, except discharges pursuant to a state operating permit, other than storm water discharge permits and discharges from fire fighting activities (10 CSR 20-6.200 (1)(C)(7)). These inspections will be documented and kept on file for review for a minimum of five years.
- b. The Facility Manager or designee is responsible for conducting quarterly inspections. These have been added to the Preventive Maintenance Program in the form of a Planned Event. Currently the Outside Landscape Foreman conducts these. Quarterly documentation is on file in the Facility Department for review.
- c. Annually the Safety Manager and Facilities Manager will conduct a review of all inspection documentation, and conduct the Annual Inspection using the Storm Water Check Sheet Report (Attachment -1) to the MODNR no later than **July 28**. This documentation will remain on file in the safety department indefinitely.
- d. While staff have been identified to conduct required inspections, it is all staffs responsibility to be able to recognize negative impacts to the environment specifically caused by storm water management or lack there of. Potential negative impacts such as soil erosion, illicit discharges, petroleum sheen, visible trash collecting, stains, foul odors, vegetation changes, unsightly color or turbidity, must be reported to the safety department for investigation and or mitigation.



8. **SAMPLING/TESTING ANALYSIS:**

- a. At a minimum the freeboard rain water collected in the secondary containment of the above ground fuel storage tanks will be sampled and analyzed by an independent laboratory. Results will be reviewed and if within appropriate ranges the freeboard (rainwater) may be discharged to the environment. If acceptable limits are exceeded, the freeboard will be collected and disposed of as hazardous waste. See USMCFP Safety Procedures entitled Hazardous Waste Communication for further guidance.
- b. At a minimum, one grab sample will be collected and forwarded to an independent laboratory from outfall #4. This outfall collects and distributes all rain waters collected at the firing range area.

9. **CONSTRUCTION ACTIVITIES:**

Impacts to the storm water management process from construction activities will be closely monitored by the Safety Manager and Facility Manager. These impacts will be discussed during pre-construction meetings. These procedures will be reviewed with all contractors prior to construction activities which disturb equal to or greater than one acre.

10. **TRAINING:**

All staff will receive awareness training with the storm water management plan during annual refresher training. New staff will be trained during the safety portion of Institutional Introduction to Correctional Techniques. Facility staff will receive additional training during their annual safety training due to their potentially high impact to the environment in the course of completing their daily duties, and responsibilities.

11. **OUTFALL LOCATIONS:**



**OUTFALL 001**

Legal Description  
Latitude: +371057.0  
Receiving Water  
1<sup>st</sup> Classified  
USGS/ SUB WATERSHED

NW ¼, NW ¼, Sec. 34, T29, R22, Greene County  
Longitude: - 931938.3  
Fassnight Creek (P)  
Unnamed Tributary to Fassnight Creek (3370)  
11010002-020001

**OUTFALL 002**

Legal Description  
Latitude: +371056.2  
Receiving Water  
1<sup>st</sup> Classified  
USGS/ SUB WATERSHED

NW ¼, NW ¼, Sec 34, T29, R22, Greene County  
Longitude: - 931905.1  
Fassnight Creek (P)  
Unnamed Tributary to Fassnight Creek (3370)  
11010002-020001

**OUTFALL 003**

Legal Description  
Latitude: +371019.9  
Receiving Water  
1<sup>st</sup> Classified  
USGS/ SUB WATERSHED

NE ¼, SE ¼, Sec 34, T29, R22, Greene County  
Longitude: - 931909.6  
South Creek (P)  
South Creek (3369)  
11010002-020001

**OUTFALL 004**

Legal Description  
Latitude: +371019.6  
Receiving Water  
1<sup>st</sup> Classified  
USGS/ SUB WATERSHED

SW ¼, SW ¼, Sec. 34, T29, R22, Greene County  
Longitude: - 931937.0  
South Creek (P)  
South Creek (3369)  
11010002-020001







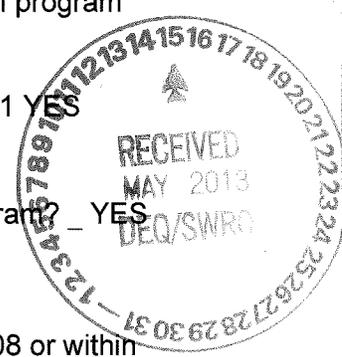
Attachment 1

MISSOURI PHASE II MS4 STORM WATER MANAGEMENT PROGRAM (SWMP) CHECKLIST

- 1) Does your MS4 have a separate, stand-alone, comprehensive program plan for each of the six minimum control measures (MCMs)? YES NO \_ (could be just one large plan, but individual plans for each MCM are helpful.)
- 2) What are the primary Public Education and Outreach (PEO) products, events and timelines for your MS4? Annual training, Quarterly Newsletter, weekly environmental E-mails.
- 3) What are the primary features of your Public Involvement and Participation (PIP) plan? Cereen County Environmental Advisory Board meetings, Participation in the James River Watershed.
  - a) Does your PIP plan provide for direct public involvement and participation in the development of the SWMP, the development of related policies, regulations and plans, and the continued implementation and oversight of the SWMP? YES NO \_
  - 4) Does your MS4 have an illicit discharge ordinance that meets the intention and subsections of the permit? YES NO \_
    - a) Do you have a storm sewer system map that includes outfalls and open conveyances? YES NO \_
    - b) Does your Illicit Discharge Detection and Elimination (IDDE) program include a formal inspection plan and formal procedures for visual/field screening of outfalls and open conveyances? YES NO \_
    - c) Do you have a formal IDD training program for municipal inspectors? YES NO \_
    - d) Do you have a formal complaint and response program? YES NO \_
    - e) Is IDDE addressed in your PEO program? YES NO \_
  - 5) Does your MS4 have a construction ordinance that meets the intention and subsections of the permit? YES NO \_
    - a) Is it relatively as stringent as the State land disturbance permit? YES NO \_
    - b) Does your construction program (CP) include a formal adoption or reference to a menu of preferred best management practices (BMPs) for contractors/developers? YES NO \_
    - c) Does the CP include BMP training for contractors/developers/operators? YES NO \_
    - d) Does the CP include a formal inspection plan, formal inspection protocol and an inspection schedule for oversight of the construction program? YES NO \_
    - e) Does the CP include formal training for municipal inspectors? YMBOL144\Symbol"11 YES NO
    - f) Do your municipal projects comply with these requirements, and are your projects included in the inspection program? \_ YES NO
    - g) Does your CP include formal procedures for review and consideration of public input? YES NO



- h) Does your CP entail any certification requirements for SWPPPs? YES NO (this item is currently optional, but is a long-term objective for the program.)
- 1) Does your MS4 have a post-construction ordinance(s) that meets the intention and subsections of the permit? YES NO
- a) Which of the following ordinances does your post-construction program (PCP) include?  
 Stream setback OL144\f"Symbol"\s11 YES NO  
 Overlay zoning ordinance or performance-based Planned Unit Development? YES  
NO  
 General post-construction ordinance inclusive of i) & ii)? YMBOL144\f"Symbol"\s11 YES  
NO  
 Other? notification YES NO
- b) Does your PCP include green space set asides? YES NO
- c) Does your PCP easements and covenants for those set asides? BOL144\f"Symbol"\s11  
YES NO
- d) Does your PCP an inspection/audit plan? YES NO
- e) Does your PCP inspector training for MS4 staff? YES NO
- f) Does your PCP address small storm events and water quality? MBOL144\f"Symbol"\s11  
YES NO
- g) Does your PCP and ordinance(s) tie back to your comprehensive plan? YES NO
- η) Does your PCP include a formal adoption of BMPs for developer design/building teams?  
YES NO
- i) Does your community planning review and approval process address post-construction practices at the beginning of design and review? YES NO
- 1) Does your MS4 have a Pollution Prevention & Good Housekeeping in Municipal Operations (PPGH) program? YES NO
- a) Does it include a list of all municipal operations? YES NO
- b) Does it include a storm water scenario report for each operation? YES NO
- c) Do you have a formal BMP training program for municipal employees? YES NO
- d) Do you have formal inspection procedures and an inspection plan? YES NO
- 1) Have you designated a primary person responsible for the entire MS4 program? YES  
NO
- a) Have you designated and listed a responsible person for each separate responsibility of the program? YES NO
- Have you addressed/identified specific urban pollutants/sources in your individual program components as required by the permit? YES NO
- Identified specific products/events? YES NO
- Identified targeted audiences for specific products/events? BOL144\f"Symbol"\s11 YES  
NO
- Identified accomplishment dates? YES NO
- 10) Have you identified ongoing funding mechanisms/sources for your MS4 program? YES  
NO Established Budget Plan
- Is your MS4 adequately staff to manage this program? YES NO
- 11) Will your MS4 program be fully implemented and operational by March 9, 2008 or within five years of initial permit issuance? YES NO
- Do you have an implementation plan with defined action items and corresponding timelines (i.e. a schedule of implementation spread across the five-year permit period?) YES  
NO



Are you implementing it? YES NO \_

Does your program include required measures of success for each MCM? YES NO \_

Are you submitting annual reports by April 10 of each year? BOL144\rf"Symbol"\"s11 YES \_

NO

July 28

Inspector:

Safety Manager

Date:

6-13-13

Facility Manager:

Date:

5-13-13



U.S. MEDICAL CENTER FOR FEDERAL PRISONERS  
SPRINGFIELD, MISSOURI  
STORMWATER ANNUAL REPORT - MS4 (June 2013)



**Illicit Discharge Detection and Elimination**

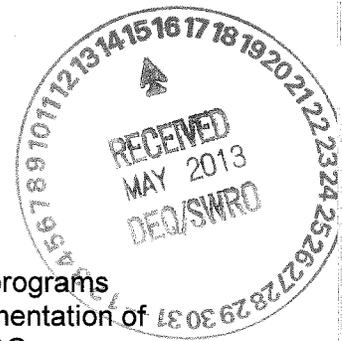
1. **Implementation status:** The Medical Center will continue to monitor the storm drain system map of all boundaries and outfall areas along with discharge systems. Written procedures and inspection forms will be annually reviewed to ensure proper documentation of dry weather screening processes, to prevent illicit discharges to the environment and illicit connections to storm water drainage systems.
2. **Overall compliance with permit conditions:** The Medical Center has developed a written policy and procedure to prevent illicit discharge to the environment regarding storm water runoff. Overall, the Medical Center ensures that pollutants, solid, liquid or gaseous in nature are not released within the storm water drainage system.
3. **Results of information collected and analyzed, if any:** Building materials, laundry operations, chemical containment and other minimal processes are controlled and released properly. We are aggressively in pursuit of environmentally friendly products. The Medical Center has switched to green laundry chemicals and green sanitation chemicals. The Medical Center has currently purchased green pest control chemicals and will utilize these chemicals upon eliminating non-green pest control in stock.
4. **Brief summary of storm water activities you plan to undertake during next reporting cycle:** The Safety Manager and Safety/CES have attended monthly Environmental Advisory Board Meeting and one Local Emergency Planning Committee meeting. Plans are to attend these meetings on a monthly basis. The Medical Center started receiving the weekly Ozark Water Watch news letter put out by the Ozark Water Shed Committee. Plans are to participate in one community project within this reporting period.
5. **Proposed changes to the program area:** No program changes are required to date.
6. **A summary of the number and nature of inspections and formal enforcement actions performed:** The identified areas are inspected and documented on at least a monthly basis. Follow-up actions are required when a deficiency is noted. Mr. Charles Gleason, Environmental Specialist conducted an Environmental Assistance Visit on June 19, 2009. A RCRA EPA inspection was conducted on May 7, 2013 with no violations noted.

U.S. MEDICAL CENTER FOR FEDERAL PRISONERS  
SPRINGFIELD, MISSOURI  
STORMWATER ANNUAL REPORT - MS4 (JUNE 2013)



**Public Education/Outreach**

1. **Implementation status:** The Medical Center Plan primarily involves staff, federal inmates and restricted visitors. Staff and inmates have been informed about the SWMP during various orientation and training session since initial implementation. Signage has been installed on parking lot storm water inlet covers and trash receptacles asking all to place waste in designated receptacles. The four effluent discharges have been labeled and numbered. This information has also been communicated via e-mail correspondence.
2. **Overall compliance with permit conditions:** The Medical Center is in compliance with the public education and outreach component of the plan.
3. **Results of information collected and analyzed, if any:** The Medical Center has collected verbal feedback communication from all involved in asking about posted signage. No information has been collected or analyzed at this point.
4. **Brief summary of storm water activities you plan to undertake during next reporting cycle:** More frequent in-depth departmental in services concerning specific roles and responsibilities within the plan. Evaluate effectiveness of signage and make corrections where needed. Additional postings on bulletin board and possibly establish a local web page with pertinent information. Continue involvement in the local Environmental Advisory Board and the Local Emergency Planning Commission.
5. **Proposed changes to the program area:** No program changes are required to date.
6. **A summary of the number and nature of inspections and formal enforcement actions performed:** The identified areas are inspected and documented on at least a monthly basis. Follow-up actions are required when a deficiency is noted.



**Good Housekeeping for municipal operations**

1. **Implementation status:** The Medical Center has existing environmental programs which prevent or reduce pollutant run-off from facility operations. With implementation of an Environmental Management System in effect a comprehensive \* PLAN - DO - CHECK-ACT approach is in place at this time. A continual review of operations and maintenance programs through formal and informal internal controls fosters a green operations and minimizes illicit discharges to the environment. Storm water pollution prevention training has been added to orientation and formal training throughout the year. A thorough review of the SPCC was accomplished.
2. **Overall compliance with permit conditions:** Good environmental stewardship has been a hallmark within the Bureau of Prisons, development of good housekeeping has been a cornerstone with all environmental programs and auditing processes. USMCFP SPRINGFIELD received 2nd Party EMS Certification on January 12, 2012. A major accomplishment was the completion of the storm water Institutional Procedures, Check Sheets, storm water drain maps, with directional flows. This was a great help in identifying potential illicit discharge target areas.
3. **Results of information collected and analyzed, if any:** The Medical Center has collected written inspections conducted by the safety department on a monthly basis for 12 months with no illicit discharges noted. Additionally, on a quarterly basis a preventive maintenance program on the effluent storm drains has been established. Annual sampling of the secondary containment areas and oil water separators has been taken for 2009, 2010, 2011 and 2012.
4. **Brief summary of storm water activities you plan to undertake during next reporting cycle:** Continue to explore methods of reuse, reduction and recycling of potential waste products. The Bureau of Prisons has set forth standards to reduce solid waste in the local landfill by 50% by the fiscal year 2015. Soil erosion evaluations are scheduled with appropriate controls being implemented, where needed. Annual sampling for 2013 will be conducted by June 1, 2012.
5. **Proposed changes to the program area:** No program changes are required to date.
6. **A summary of the number and nature of inspections and formal enforcement actions performed:** The identified areas are inspected and documented on at least a monthly basis. Follow-up actions are required when a deficiency is noted. Quarterly preventive maintenance inspections and an Annual EMS report is forwarded to the CEO (Warden) for review, and signature.

U.S. MEDICAL CENTER FOR FEDERAL PRISONERS  
SPRINGFIELD, MISSOURI  
STORMWATER ANNUAL REPORT - MS4 (JUNE 20132)



**Pre & Post Construction**

1. **Implementation status:** The Medical Center does not currently plan to disturb one or more acres of land. Pre-construction meeting checklist will be modified to include storm water concerns should acreage disturbance occur.
2. **Overall compliance with permit conditions:** Major construction with an acre or larger is not anticipated at the Medical Center in the near future. Environmental impact studies with additional approval processes involving storm water impact will be required before any land disturbance takes place. Currently the state of Missouri or the city of Springfield does not have a Low Impact Design Manual. Upon the notification of plans to disturb > 1 acre of land will initiate the creation of design teams and notification of the MODNR.
3. **Results of information collected and analyzed, if any:** The laboratory analytical data on the grab samples taken of the freeboard collected in the secondary containment systems for the AST's has been reviewed for state permitting requirements of effluent discharges.
4. **Brief summary of storm water activities you plan to undertake during next reporting cycle:** An annual review will be conducted of the local policy and pre construction checklist to ensure compliance with the Storm Water Management Plan. This would include all required permits and preventative measures necessary to prevent/minimize illicit storm water run-off. Annual sampling and analysis of secondary containment area for fuel tanks will be conducted by June 1, 2013.
5. **Proposed changes to the program area:** Continued Improvement of Best Management Practices focusing on preserving natural features, minimizing disturbance, and managing rainfall as close to the source as possible.
6. **A summary of the number and nature of inspections and formal enforcement actions performed:** The identified areas are inspected and documented on at least a monthly basis. Follow-up actions are required when a deficiency is noted. Additionally, quarterly inspections of the out falls have been initiated, and are on file for review.