

8090 Villa Park Drive
Richmond, Virginia 23228
(804) 264-2228 • Fax (804) 264-8773
www.daa.com

January 12, 2016

Mr. Allan Brockenbrough II, P.E.
Manager, Office of VPDES Permits - DEQ
P.O. Box 1105
Richmond, VA 23218

**RE: Virginia Pollutant Discharge Elimination System (VPDES) MS4 Permit
VAR040128, Virginia Department of Juvenile Justice – Bon Air, Chesapeake Bay**

Dear Mr. Brockenbrough:

The Department of Juvenile Justice (DJJ) has received your email of October 26, 2015 requesting additional information concerning the TMDL Action Plan for the Chesapeake Bay TMDL Action Plan submitted by the DJJ on October 1, 2015.

Below are the comments from your letter followed by additional information in bold typeface:

1. Comment 1: Where do the outfalls that were excluded drain? In your response you mention that they are not directly connected to VDOT's system. Any lands that drain to the permittee's regulated system should be included in the service area. Based on the information provided, it appears that the lands draining to those two outfalls should not have been excluded from the service area. If I have misunderstood the information provided, please let me know.

Additional Information: These outfalls have been marked on the attached map. They drain to the wooded area on the west side of the DJJ Bon Air property. The lands draining to these outfalls was included in the MS4 definition, but they are not interconnects to the VDOT MS4.

2. Comment 2: The additional information submitted did not include the revised Table 2 referenced in response to comment 2. Please forward that revised table.

Response: Table 2 is attached.

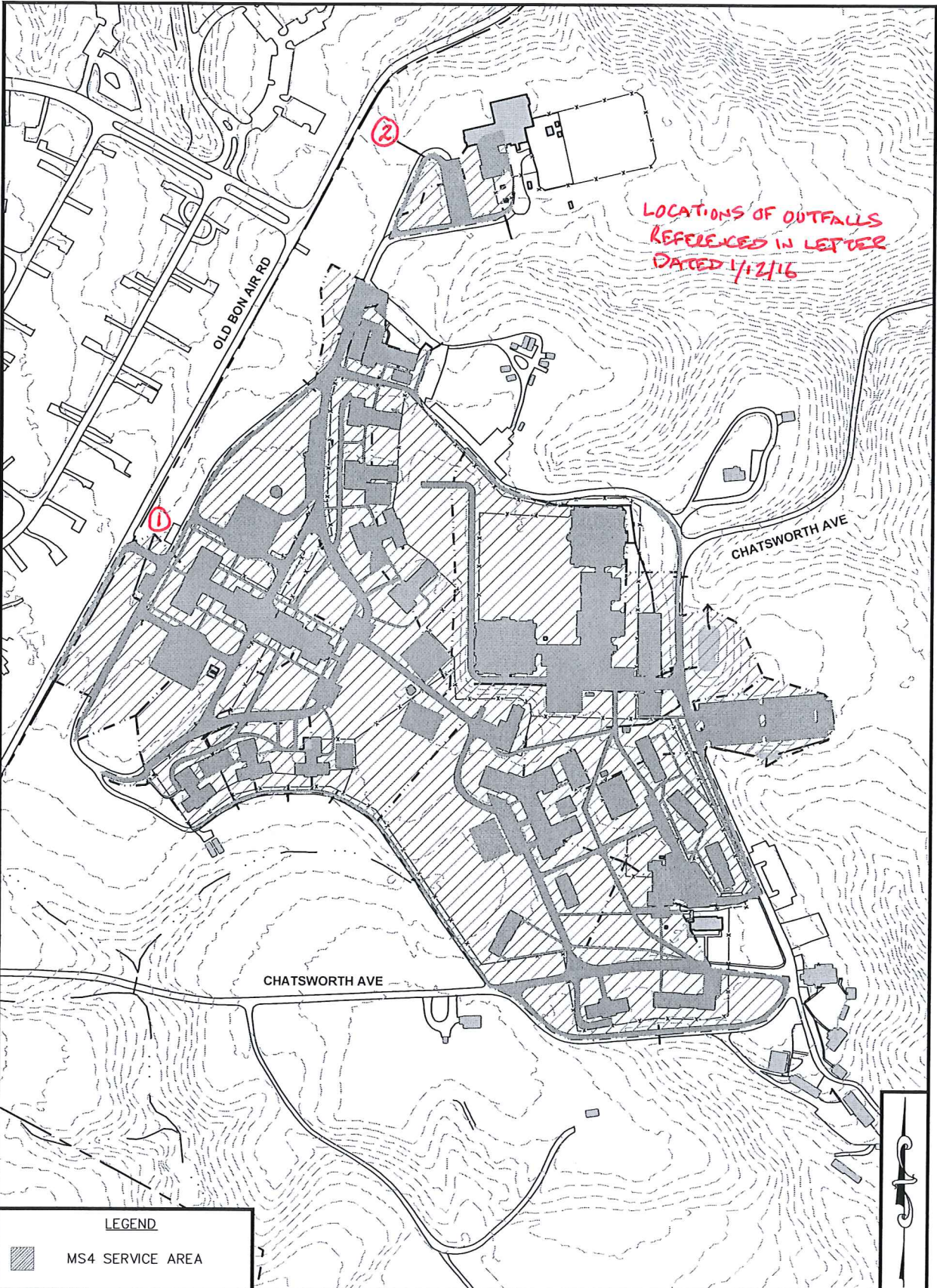
We hope that this additional information is sufficient to address your concerns. If you have any questions, please feel free to call me at 804-237-1803 or email me at gtelfer@daa.com. Please copy Mr. Robert Wilburn of DJJ on any correspondence (Robert.wilburn@djj.virginia.gov).

Sincerely,
DRAPER ADEN ASSOCIATES




Glenn H. Telfer, P.E., LEED AP
Associate

cc: Mr. Robert Wilburn – DJJ
Ms. Jamie Bauer – DEQ
Ms. Kelsey Brooks - DEQ



P:\21100021162\162-15\CADD\21162-15_SPE21162-15_MS4_Service_Area.dwg - June 26, 2015, 9:18:10 PM

LEGEND

 MS4 SERVICE AREA

Draper Aden Associates
Engineering • Surveying • Environmental Services
 8090 Villa Park Drive
 Richmond, VA 23228
 804-264-2228 Fax: 804-264-8773

Blacksburg, VA
 Charlottesville, VA
 Hampton Roads, VA
 Coats, NC

DESIGNED NRH
 DRAWN NRH
 CHECKED GHT
 DATE JUNE 30, 2015

SCALE: 1" = 250'
 PROJECT: 21162-15

APPENDIX
 4

MS4 SERVICE AREA & LAND COVER MAP
 DJJ BON AIR - CHESAPEAKE BAY TMDL ACTION PLAN
 CHESTERFIELD COUNTY, VA

4.5 Additional Loads

The guidance document requires additions to the WLA due to certain projects initiated between July 1, 2009 and June 30, 2104 under Special Condition Requirements 7 and 8. Projects at the university during this time period fall under Situation 4 of the guidance document and this requirement does not apply.

4.6 MS4 WLA Calculation

The following table provides the WLA required for each MS4 permit cycle:

Table 2: WLA for Each MS4 Permit Cycle

Permit Period	Removal Requirement		
	N (lb)	P (lb)	TSS (lb)
First (2013-2018) 5%	1.40	0.30	129.00
Second (2018-2023) cumulative 40%, estimated	9.80	2.10	903.00
Third (2023-2028) cumulative 100%, estimated	16.80	3.60	1,548.00

Calculations are included at Appendix 5. The current MS4 permit provides the required removal for the current compliance period. The required removals for subsequent removal periods can only be estimated because the total WLA will be revised by DEQ in response to additional Chesapeake Bay modeling and other factors.