

**VPDES MUNICIPAL SEPARATE STORM SEWER
SYSTEM (MS4) PERMIT
VAR 040128**

REPORTING PERIOD JULY 1, 2016 TO JUNE 30, 2017

**DEPARTMENT OF JUVENILE JUSTICE (DJJ) BON AIR
FACILITY**



September 2017

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APPENDICES

A. MS4 Program Plan

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.

Responsible Official Signature	Date
Print Name: Daryl W. Francis	Title: Deputy Director of Administration & Finance Division

<u>VAR040128</u>	VA Dept. of Juvenile Justice - Consolidated MS4s at Bon Air
Permit Number	MS4 Name

I. INTRODUCTION

On April 18, 2014, the Department of Juvenile Justice (DJJ) was issued an MS4 permit by the Virginia Department of Environmental Quality (DEQ) for the Bon Air facility. This permit sets forth minimum requirements for the operation and maintenance of the storm sewer system, including storm water treatment systems (BMPs), and is reissued every five years. The permit requires an annual report to be submitted to DEQ by October 1, 2017 describing progress on meeting permit requirement during the period from July 1, 2016 to June 30, 2017. DJJ Bon Air has met the majority of permit requirements during the reporting period. Compliance with the public participation requirement of four events (Section II.B.2.d(2)) was not possible due to security access control standards. DJJ Bon Air will continue to explore ways to meet this requirement.

II. COMPLIANCE SUMMARY

In multiple sections of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

A. Background Information.

1. Permittee name and permit number;

Response: VA Dept. of Juvenile Justice - Consolidated MS4s at Bon Air, permit VAR040128.

2. The annual report permit year and reporting period;

Response: This Annual Report is for 2016 covering the reporting period July 1, 2016 to June 30, 2017.

3. Modifications to any operator's department's roles and responsibilities;

Response: There have been no changes in any operator's department's roles and responsibilities.

4. Number of new MS4 outfalls and associated acreage by HUC added during the permit year; and

Response: There have been no new outfalls added during the permit year.

5. Signed certification (See Attachment 1);

Response: See page 1 for signed certification.

B. Minimum Control Measure Implementation.

1. MCM1 – Public Education and Outreach

- a. Items relating to Permit Section II.B.1.g(1)

Response: At DJJ Bon Air, the public are the residents and staff. DJJ Bon Air serves has a capacity to house up to 284 residents. Lengths of commitment may range from a minimum of 3-6 months to a maximum of 7 years or until the resident's 21st birthday. Residents receive educational, vocational, mental health and rehabilitative counseling services. Opportunities to add additional educational curriculum, the use of outside instructors, and field trips outside the facility are limited. Staff is

approximately 200 over all three shifts, including approximately 21 O&M staff. Of the O&M staff, approximately 4 are dedicated to day to day grounds maintenance.

During this reporting period limited education and outreach activities were conducted. Stormwater issues were included as part of some resident science classes.

b. Items relating to Permit Section II.B.1.g(2)

Response: During the next reporting period, the current education and outreach efforts will continue. Additional education and outreach activities targeting maintenance and operations staff will be added as deemed necessary.

c. Status of compliance with permit conditions

Response: Compliance with the public participation requirement of four events (Section II.B.2.d (2)) was not possible due to security requirements. DJJ Bon Air will continue to explore ways to meet this requirement.

d. BMP assessment

Response: The BMP included in the MCM Program Plan is to develop an outreach strategy. Although meeting this BMP is a struggle given the nature of the DJJ Bon Air facility, this BMP does not need revision.

e. Progress toward achieving measureable goal identified in the MS4 Program Plan

Response: The three high-priority water-quality issues have been identified. Public education and outreach programs and initiatives will be further developed.

2. MCM2 – Public Involvement/Participation

a. Items relating to Permit Section II.B.2.d(1)

Response: The following is the web link to the MS4 Program Plan and annual report:

<http://www.djj.virginia.gov/pages/admin/capital-outlay.htm>

b. Items relating to Permit Section II.B.2.d(2)

Response: There were no public participation events during the reporting period. As a secure facility, it is difficult to arrange for the public to be allowed on DJJ Bon Air property to participate in stream cleanup and other events. Also, due to security concerns, the residents cannot be allowed to participate in these type of events.

c. Status of compliance with permit conditions

Response: The permit states “The operator shall participate, through promotion, sponsorship, or other involvement, in a minimum of four local activities annually e.g., stream cleanups; hazardous waste cleanup days; and meetings with watershed associations, environmental advisory committees, and other

environmental organizations that operate within proximity to the operator's small MS4.” During the reporting period DJJ Bon Air was not able to find opportunities for public participation due to security concerns.

d. BMP assessment

Response: The BMP states that four public participation activities will be identified. While this may not be possible during every annual report term, the BMP will remain.

e. Progress toward achieving measureable goal identified in the MS4 Program Plan

Response: DJJ Bon Air will continue to seek opportunities for public participation events subject to security requirements.

3. MCM3 – Illicit Discharge Detection and Elimination

a. Items relating to Permit Section II.B.3.f(1)

Response: Response: DJJ Bon Air’s MS4 system is interconnected with the VDOT MS4.

b. Items relating to Permit Section II.B.3.f(2)

Response: DJJ Bon Air has 11 outfalls from the MS4 service area. All outfalls were screened by the MS4 consultant (Draper Aden Associates) as part of the initial assessment in 2014. No indications of illicit discharge were found and no follow-up actions were required. Outfall screenings are scheduled for late 2017.

c. Items relating to Permit Section II.B.3.f(3)

Response: No investigations were conducted by the operator of any suspected illicit discharge.

d. Status of compliance with permit conditions

Response: All permit conditions under this section were met.

e. BMP assessment

Response: Current BMPs in the MCM Program Plan are adequate.

f. Progress toward achieving measureable goal identified in the MS4 Program Plan

Response: The storm sewer system has been mapped, outfall screening procedures are in the process of being updated.

4. MCM4 – Construction Site Stormwater Runoff Control

a. Items relating to Permit Section II.B.4.f(1)

Response: There was one regulated land-disturbing activity during the reporting period, the construction of a parking area with drainage routed through an existing outfall.

b. Items relating to Permit Section II.B.4.f(2)

Response: 0.77 acres were disturbed during the reporting period.

c. Items relating to Permit Section II.B.4.f(3)

Response: Periodic inspections were conducted by DJJ personnel during construction.

d. Items relating to Permit Section II.B.4.f(4)

Response: No enforcement actions were taken during the reporting period.

e. Status of compliance with permit conditions

Response: The plans for the parking lot were designed to comply with ESC regulations, but were not reviewed and approved by a VESCP authority prior to land disturbance. Inspections were conducted by DJJ personnel and ESC measures were installed and maintained during construction.

f. BMP assessment

Response: Current BMPs in the MCM Program Plan need to be updated to ensure that plan review and approval is obtained for all applicable projects.

g. Progress toward achieving measureable goal identified in the MS4 Program Plan

Response: The goals of instituting procedures to ensure plan review and approval have not been instituted as there were no planned projects at the time. Procedures will address projects such as the parking lot which are not major planned projects and do not go through the RFP process.

5. MCM5 – Post-Construction Stormwater Management

a. Items relating to Permit Section II.B.5.e

Response: DJJ Bon Air currently has two stormwater BMPs, only one of which was designed as a quality measure. In this case, an electronic database is not applicable. The information required by Section II.B.5.e is available in the Chesapeake Bay TMDL Action Plan (submitted with previous Annual Report).

During the reporting period, DJJ Bon Air performed maintenance on both BMPs consisting on clearing brush and sediment removal.

b. Status of compliance with permit conditions

Response: As stated in the previous section, there was one regulated construction activity that took place during the reporting period. The project was not reviewed and approved by a VSMP Authority for compliance with VSMP stormwater regulations.

c. BMP assessment

Response: Current BMPs in the MCM Program Plan need to be updated to ensure that plan review and approval is obtained for all applicable projects.

d. Progress toward achieving measureable goal identified in the MS4 Program Plan

Response: No project RFPs have been required, so development of language to include MS4 requirements has not yet been accomplished. Development of written procedures for BMP inspection and maintenance is ongoing. Development of electronic database has been determined to be of limited value given there is only one stormwater quality BMP.

6. MCM6 – Pollution Prevention/Good Housekeeping for Municipal Operations

a. Items relating to Permit Section II.B.6.g(1)

Response: After review of existing procedures, facilities, and daily operations, no new daily operational procedures were required to be developed.

b. Items relating to Permit Section II.B.6.g(2)

Response: After a complete analysis of all of DJJ Bon Air’s maintenance and operations facilities, it was determined that none meet the criteria for a “high-priority” facility provided in the MS4 permit. Therefore, no SWPPPs for maintenance and operations facilities are required.

c. Items relating to Permit Section II.B.6.g(3)

Response: There is no application of fertilizers or general herbicides on lawn areas, therefore no turf and landscape nutrient management plans are required.

d. Items relating to Permit Section II.B.6.g(4)

Response: After review of existing training and daily operations, no new training needs related to stormwater were identified. This will continue to be reviewed and stormwater specific onsite training will be provided by the operator’s consultant (Draper Aden Associates).

e. Status of compliance with permit conditions

Response: All permit conditions under this section were met.

f. BMP assessment

Response: The BMP in the MCM Program Plan has been revised to reflect that there is no application of fertilizers or general herbicides on lawn areas.

g. Progress toward achieving measureable goal identified in the MS4 Program Plan;

Response: Progress in achieving all measureable goals is ongoing.

C. Results of information collected and analyzed, including monitoring data, if any, during the reporting period;

Response: No information, including monitoring data, was collected during the reporting period.

D. A summary of the stormwater activities the operator plans to undertake during the next reporting cycle;

Response: During the next reporting cycle, in addition to items included in the MCM Program Plan, DJJ Bon Air plans to implement the Chesapeake Bay TMDL Action Plan by changing land cover from lawn to forest in accordance with approved plan.

The DEQ audit on June 8, 2017 identified some ideas for improving the Program Plan. DJJ Bon Air will review these during the next permit cycle.

- E. A change in any identified best management practices or measurable goals for any of the minimum control measures including steps to be taken to address any deficiencies;

Response: See previous responses.

- F. Notice that the operator is relying on another government entity to satisfy some of the state permit obligations (if applicable);

Response: DJJ Bon Air is not relying on any other government entity to satisfy state permit obligations.

- G. The approval status of any programs pursuant to Section II.C of the general permit (if appropriate), or the progress towards achieving full approval of these programs; and

Response: No alternate programs are being pursued under Section IIC.

- H. Information required for any applicable TMDL special condition contained in Section I of the general permit.

Response: The only TMDL applicable to the DJJ Bon Air facility is the Chesapeake Bay TMDL. No other information is required.

- I. Signed certification statement. See Attachment 2.

Response: See page 1 for signed certification statement.

MS4 Program Plan

Department of Juvenile Justice - Consolidated MS4s at Bon Air

The following plan provides an initial MS4 Program Plan framework. During the course of accomplishing the tasks in this framework, DJJ accordance with Table 1 of the MS4 Permit. Compliance with the first milestone (5%) of the Chesapeake Bay TMDL is due 8/21/2018.

Permit Date: April 18, 2014

Minimum Control Measure No. 1: Public Education and Outreach on Storm Water Impacts

Permit Requirements	Proposed BMP	Elements of BMP	Measurable Goals	Preliminary Implementation Schedule	Preliminary Responsible Department
1.a - Continue to implement the public education and outreach program	Develop outreach strategy	See below	See below	See below	See below
1.b-f - Public education and outreach programs and initiatives - due 8/21/2014	Develop outreach strategy	Identify three high-priority water quality issues	Three high-priority water quality issues identified	6/1/2014	CO
		Identify and estimate target population size	Target population identified and size estimated	6/1/2014	CO
		Develop relevant messages and means of communication	Relevant messages developed	6/1/2014	CO
		Provide for public participation in development of education and outreach	Means of public participation identified	6/1/2014	CO
1.g - Annual reporting requirements - first report due 10/1/2014	Document results of workshop and commitments to further action	Prepare documentation to be included in annual report	Documentation prepared	9/1/2015	CO

CO - Capital Outlay Unit of DJJ Administration & Finance Division

Department of Juvenile Justice - Consolidated MS4s at Bon Air

Minimum Control Measure No. 2: Public Involvement/Participation

Permit requirements	Proposed BMP	Elements of BMP	Measurable Goals	Preliminary Implementation Schedule	Preliminary Responsible Department
2.a. - Public involvement	Develop public involvement strategy	Develop procedures to solicit and public input to the development of the MS4 Program Plan	Procedures developed and recorded	8/1/2014	CO
	Post MS4 Program Plan to website	Post initial MS4 Program Plan (this document) to DJJ website	Document posted within 30 days of submittal of registration statement	3/10/2014	CO
	Post MS4 annual reports to website	Identify procedures and contact for posting to DJJ website	Procedures and contact identified	11/1/2014	CO
2.b. - Public participation	Develop public participation strategy	Identify a minimum of four local activities	Four activities identified	8/1/2014	CO
2.c. - Written procedures	Develop written procedures for implementing program	Prepare documentation to be included in annual report	Documentation prepared	8/1/2015	CO

CO - Capital Outlay Unit of DJJ Administration & Finance Division

Department of Juvenile Justice - Consolidated MS4s at Bon Air

Minimum Control Measure No. 3: Illicit Discharge Detection and Elimination

Permit Requirements	Proposed BMP	Elements of BMP	Measurable Goals	Preliminary Implementation Schedule	Preliminary Responsible Department
3.a - Storm sewer system mapping and information table - due 8/21/2017	Survey existing storm sewer	Map to include: location of all outfalls, outfall identifiers, name and location of receiving waters & name and location of all receiving waters	Develop completed map	6/1/2014	Draper Aden Associates (consultant)
		Information table to include for each outfall: identifier, estimate MS4 acreage served, name of receiving water with impairment status, & name of TMDLs.	Assign outfall identifiers	6/1/2014	Draper Aden Associates (consultant)
3.b - Prohibition of Non-stormwater Discharges - due 8/21/2014	Create or locate existing written documentation to prohibit nonstormwater discharges to the storm sewer.	Create written documentation summarizing existing applicable documentation and, if required, the schedule for making necessary revisions.	Written documentation created	6/1/2014	CO
3.c - Develop, implement, and update written procedures to detect, identify, and address unauthorized nonstormwater discharges, including illegal dumping, to the MS4 - due 8/21/2014	Dry weather field screening procedures	Develop written procedures	Written documentation created	6/1/2014	CO
		Conduct outfall screenings	All outfalls screened	6/1/2014	CO
	Procedures to locate source of any observed continuous or intermittent nonstormwater discharge	Maintain inspection program that includes all stormwater outfalls. Inspectors use visual observation, odors and other indicators to identify potential illicit discharges.	Written documentation created	6/1/2014	CO
3.d - Promote, publicize, and facilitate reporting of illicit discharges into or from MS4 - due 8/21/2014	Existing spill reporting procedures	Identify existing spill reporting procedures	Written documentation created	6/1/2014	CO
3.e & f - MS4 Program Plan & annual reporting first report due 10/1/2014	Document results of workshop and commitments to further action	Prepare documentation to be included in annual report	Documentation prepared	9/1/2015	CO

CO - Capital Outlay Unit of DJJ Administration & Finance Division

Department of Juvenile Justice - Consolidated MS4s at Bon Air

Minimum Control Measure No. 4: Construction Site Stormwater Runoff Control

Permit Requirements	Proposed BMP	Elements of BMP	Measurable Goals	Preliminary Implementation Schedule	Preliminary Responsible Department
4.a - Applicable oversight requirements	Address post-construction stormwater that enters MS4 from construction	Ensure compliance with DEQ ESC design requirements for all proposed projects over 2,500 sf of disturbance	Include language in all project RFPs for design services	ongoing	CO
4.b - Required plan approval prior to commencement of land disturbance activity	Ensure that land disturbance does not begin until an ESC plan is approved	Plan review and approval is by DEQ	Include language in all project RFPs for design services to require A/E to obtain required approvals	ongoing	CO
4.c - Compliance and enforcement	Inspect land-disturbing activities for compliance with approved ESC plan	Inspect land-disturbing projects upon initial installation of ESC measures, at least once during every two-week period, within 48-hours of runoff-producing storm event, and upon completion of the project	Review E&S inspection procedures	ongoing	CO
		Ensure ESC inspector holds current DEQ ESC certification			CO
		Document inspections, findings of deficiencies, and corrective actions taken by contractor.			CO
4.d - Regulatory coordination	Implement enforceable procedures to require that construction activities secure necessary state permits.	Create written procedures	Create written procedures	8/1/2014	CO

Minimum Control Measure No. 4: Construction Site Stormwater Runoff Control

Permit Requirements	Proposed BMP	Elements of BMP	Measurable Goals	Preliminary Implementation Schedule	Preliminary Responsible Department
4.e - MS4 Program requirements	MS4 Program Plan to include: description of legal authorities, written plan review procedures, written inspection procedures,	Revise MS4 Program Plan	Revise MS4 Program Plan	8/1/2014	CO
4.f - Reporting requirements - first report due 10/1/2014	Document results of workshop and commitments to further action	Prepare documentation to be included in annual report	Documentation prepared	9/1/2015	CO

CO - Capital Outlay Unit of DJJ Administration & Finance Division

Department of Juvenile Justice - Consolidated MS4s at Bon Air

Minimum Control Measure No. 5: Post-Construction Stormwater Management in New Development and Redevelopment

Permit Requirements	Proposed BMP	Elements of BMP	Measurable Goals	Preliminary Implementation Schedule	Preliminary Responsible Department
5.a - Applicable oversight requirements - due 8/21/2014	Address post-construction stormwater that enters MS4 from construction	Ensure compliance with DEQ stormwater design requirements for all proposed projects over 2,500 sf of disturbance	Include language in all project RFPs for design services	ongoing	CO
5.b - Required design criteria for stormwater runoff controls - due 8/21/2014	Utilize specific contract language to require project design to comply	Ensure compliance with DEQ stormwater design requirements for all proposed projects over 2,500 sf of disturbance	Include language in all project RFPs for design services	ongoing	CO
		Ensure that all proposed projects obtain coverage under VSMP General Construction Permit	Include language in all project RFPs for construction services	ongoing	CO
5.c - Inspection, operation, and maintenance verification of stormwater management facilities - due 8/21/2014	Provide for adequate long-term operation and maintenance of structural stormwater BMPs	Create written inspection procedures	Written procedures	6/1/2014	CO
		Inspect existing BMPs	BMPs inspected and written reports created	6/1/2014	CO
5.d - MS4 Program Plan requirements - due 8/21/2014	Create MS4 Program Plan	MS4 Program Plan to include list of legal authorities, written policies and procedures, inspection and maintenance policies, and roles and responsibilities	MS4 Program Pplan created	6/1/2014	CO
5.e - Stormwater management facility tracking and reporting requirements - due 8/21/2014	Maintain an electronic database of all stormwater management facilities	Create electronic database with existing BMPs to include type, location, acres treated (total and impervious), date brought online, HUC, impaired water segments, and last inspection and maintenance dates	Electronic database created	6/1/2015	CO

CO - Capital Outlay Unit of DJJ Administration & Finance Division

Department of Juvenile Justice - Consolidated MS4s at Bon Air

Minimum Control Measure No. 6: Pollution Prevention/Good Housekeeping for Facility Operations

Permit Requirements	Proposed BMP	Elements of BMP	Measurable Goals	Preliminary Implementation Schedule	Preliminary Responsible Department	
6.a - Operations and maintenance activities - due 8/21/2015	Develop and implement written procedures to minimize pollutant discharge from (i) daily operations such as road, street, and parking lot maintenance; (ii) equipment maintenance; and (iii) application, storage, transport, and disposal of pesticides, herbicides, and fertilizers	Review required procedure categories with DJJ maintenance and grounds department heads to identify existing written procedures and gaps where new written procedures are required.	Hold workshop with DJJ maintenance and grounds	3/1/2015	CO	
		Create new written procedures, if required	Create new written procedures	3/1/2015	CO	
6.b - Municipal facility pollution prevention and good housekeeping - due 8/21/2014	Identify all high-priority facilities, including: (i) compost facilities, (ii) equipment storage and maintenance facilities, (iii) materials storage yards, (iv) pesticide storage facilities, (v) public works yards, (vi) recycling facilities, (vii) salt storage facilities, (viii) solid waste handling and transfer facilities, and (ix) vehicle storage and maintenance yards.	Review existing facilities with DJJ maintenance and grounds department heads to identify which operations are conducted at the facility and locations.	Hold workshop with DJJ maintenance and grounds	None identified	CO	
		Identify which of the high-priority facilities have a high potential of discharging pollutants based on the criteria provided in the permit.	Hold workshop with DJJ maintenance and grounds	None identified	CO	
		Develop SWPPPs for for required facilities	SWPPPs shall provide criteria listed in permit, as a minimum	SWPPPs prepared for any required high-priority facilities	Not required	CO
		Implement SWPPPs - due 8/21/2017	Implement SWPPPs	Implement SWPPPs	Not required	CO
6.c - Turf and landscape management - due 8/21/2014	Develop Nutrient Management Plans (NMPs).	Identify applicable areas: contiguous areas greater than one acre where nutrients are applied.	Sketch developed showing areas where nutrients are applied	not required, no fertilizer applied to lawn areas	CO	
		Develop NMPs for all applicable areas, if any.	Contract with outside consultant to develop NMPs	not required, no fertilizer applied to lawn areas	CO	
	Implement NMPs - due 8/21/2018	Implement NMPs	Implement NMPs	not required, no fertilizer applied to lawn areas	CO	
6.d - Training - due 8/21/2014	Conduct annual training for employees	Review existing training programs against permit requirements	Hold workshop with DJJ maintenance and grounds	6/1/2014	CO	

Minimum Control Measure No. 6: Pollution Prevention/Good Housekeeping for Facility Operations

Permit Requirements	Proposed BMP	Elements of BMP	Measurable Goals	Preliminary Implementation Schedule	Preliminary Responsible Department
6.e - Oversight procedures	Require that contractors use appropriate control measures and procedures for stormwater discharges to the MS4 system.	Determine if there any contractors for which this would apply	Hold workshop with DJJ maintenance and grounds	6/1/2014	CO
6. f-g MS4 Program Plan documentation and annual reporting - first report due 10/1/2014	Document results of workshop and commitments to further action	Prepare documentation to be included in annual report	Documentation prepared	9/1/2015	CO

CO - Capital Outlay Unit of DJJ Administration & Finance Division