

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

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



September 2015

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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.

 9/30/15
Responsible Official Signature Date

Print Name: Daryl W. Francis Title: Deputy Director of Administration & Finance Division

VAR040128
Permit Number

VA Dept. of Juvenile Justice - Consolidated MS4s at Bon Air
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, 2015 describing progress on meeting permit requirement during the period from July 1, 2014 to June 30, 2015. 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. REMINDER LETTER

On June 2, 2015, DEQ sent a letter to DJJ Bon Air reminding DJJ of the deadline for the 2015 Annual Report. This letter also included several items that are required to be addressed in the Annual Report. The following are the items listed in the letter in italic typeface followed by responses in bold typeface:

Please also be reminded that the MS4 Program Plan should be updated no later than June 30, 2015 to address the program requirements list below. Note that additions made to your program plan in accordance with the permit do not need to be submitted for review and approval. However, any changes to the plan must to be documented in the annual report.

a. Minimum Control Measure 4 - Construction Site Stormwater Runoff Control Stormwater Management Progressive Compliance and Enforcement (Section II.B.4).

Response: The MS4 Program Plan was updated during the reporting period to incorporate these permit requirements and is included as Appendix A.

b. Minimum Control Measure 6 – Pollution Prevention/Good Housekeeping for Municipal Operations - Daily Good Housekeeping Procedures (Section II.B.6.a)

Response: The MS4 Program Plan was updated during the reporting period to incorporate these permit requirements and is attached as Appendix A.

III. 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 2015 covering the reporting period July 1, 2014 to June 30, 2015.

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 science classes. A partial day meeting was held to educate operations and a maintenance supervisors on MS4 permit responsibilities.

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.

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/AdminPages/CapOutUnit.aspx>

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 be 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. On April 28, 2015, DJJ Bon Air received a letter from VDOT providing notice of the interconnection.

- 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 2015.

- 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 were no regulated land-disturbing activities during the reporting period.

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

Response: Zero acres were disturbed during the reporting period.

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

Response: No inspections were conducted during the reporting period.

- 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: All permit conditions under this section were met.

f. BMP assessment

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

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

Response: As no construction projects were undertaken during the reporting period, the measureable goals were not applicable. These goals will be maintained as part of the MS4 program plan and institutes for the next applicable construction project.

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 (Appendix B).

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: All permit conditions under this section were met.

c. BMP assessment

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

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 measurable goal identified in the MS4 Program Plan;

Response: All BMP measurable goals under this section were met.

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 budget funds for the implementation of the Chesapeake Bay TMDL Action Plan.

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 (Appendix B). No other information is required.

I. Signed certification statement. See Attachment 2.

Response: See page 1 for signed certification statement.