STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES

DIVISION FOR JUVENILE JUSTICE SERVICES
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John A. Stephen
Commissioner

Rodney H. Forey
Director

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Tuesday, April 27, 2004

United States Environmental Protection Agency
Region 1
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: National Pollutant Discharge Elimination System (NPDES) Permit Number: NHR043002
2004 Annual Report

1. The Youth Development Center has completed the required self-assessment and has determined that our campus is in compliance with all permit conditions.

2. An assessment has been done of the appropriateness of the Best Management Practices (BMPs) submitted. All seem to be consistent with the intent and goal of the Youth Development Center's Storm Water Management Program with the exception of one. BMP # 6-2 has been changed.

   After internally reviewing BMP # 6-2, "Install Roof Over Vehicle Gas Pump," it was determined that a small roof over the discrete filling area of the vehicle would not prevent spillage from being washed away. Sheeting surface water would still be able to wash any spillage regardless of a small roofed area. It was therefore determined that building a small roof was not an effective means for preventing spilled gasoline from entering the storm water drainage system.

   It was decided that the root cause of this problem was careless filling of vehicles by trying to "top off." To address this issue, training will be implemented and required forms for the use of the gasoline pump currently in use will be updated. Other spill prevention countermeasures remain in place in accordance with the Youth Development Center's Spill Prevention Control and Countermeasures Plan.

3. An assessment of the progress towards achieving the measurable goals has been completed. The results of that assessment ensue, please see the attached Storm Water Management Program 2004 Annual Report BMP Summary.

cc:
Jeffrey Andrews, NH DES
Rodney Forey, Director, DJJS
Tricia Lucas, Assistant Director, DJJS

4. No information has been collected or analyzed at this time. Pursuant to BMP # 3-2, "Dry Weather Outfall Screening," outfalls on the Youth Development Center campus will be monitored during the summer of 2004 and every summer thereafter for the life of the permit. The summer of 2004 will be the first summer under which the Youth Development Center's Notice of Intent (NOI) for coverage under the NPDES general permit for storm water discharge will have been granted.

5. Activities for the next reporting cycle include BMP #s identified in the column named "Planned Activities – Permit Year 2" on the attached Storm Water Management Program 2004 Annual Report BMP Summary.

6. Changes in BMPs include that noted in paragraph # two 2 above.

7. The Youth Development Center relies on no other entities for achieving any of its measurable goals.

Sincerely,

Jeffrey M. Chierepko
Facilities Engineer
Division for Juvenile Justice Services

cc:
Jeffrey Andrews, NH DES
Rodney Forey, Director, DJJS
Tricia Lucas, Assistant Director, DJJS