STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES

DIVISION FOR JUVENILE JUSTICE SERVICES
1056 NORTH RIVER ROAD, MANCHESTER, NH 03104
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John A. Stephen
Commissioner

Rodney H. Forey
Director

05

Tuesday, April 26, 2005

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
2005 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. As discussed during our phone conversation on April 25, 2005, the Youth Development Center is currently engaged in a major construction project spanning over five acres and entirely enclosed. While under construction, I have assumed NPDES coverage under the Construction General Permit by and through our Contractor and the State of New Hampshire, Department of Public Works. As discussed yesterday, it is important to make this distinction because this presents a unique set of circumstances. As we are a very small MS4, all of our storm water related areas (catch basins, etc) are within the confined construction area, placing many of our planned Best Management Practices and Measureable Goals temporarily on hold. Per your advice during our conversation, I am continuing with this report while you inquire internally how coverage under the Construction General Permit may effect the requirements of the Annual Report.

3. An assessment has been done of the appropriateness of the Best Management Practices (BMPs) submitted. With the exception of BMPs numbered 2-2 and 3-4, all seem to be consistent with the intent and goal of the Youth Development Center's Storm Water Management Program. BMP # 6-2 was removed as detailed in the NPDES 2004 Annual Report submitted by the Youth Development Center on April 27, 2004.

   BMPs numbered 2-2, Storm Drain Stenciling Program, and 3-4, Development of a Plan to Detect and Address Non Storm Water Discharges were not completed due to the campus being under major construction. These BMPs and Measureable Goals will continue once construction is completed.

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

4. 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 2005 Annual Report BMP Summary.

5. Activities for the next reporting cycle include BMP #s identified in the column named "Planned Activities – Permit Year 3" on the attached Storm Water Management Program 2005 Annual Report BMP Summary.

6. Changes in BMPs include that noted in paragraphs two and three 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