

Municipal Separate Storm Sewer System (MS4) Program Plan

In Compliance with
MS4 General Permit No. VAR040128

For Fiscal Year
July 1, 2024 – June 30, 2025

Prepared by:
TRC Engineers, Inc.



Prepared For:
**Virginia Department of Juvenile Justice at Bon Air
Capital Outlay Unit**



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Acronyms And Abbreviations

Abbreviations/ Acronyms	Terms
BMP	Best Management Practice
CWA	Clean Water Act
DEQ	Virginia Department of Environmental Quality
EHS	Environmental, Health, & Safety
EPA	Environmental Protection Agency
ESC	Erosion and Sediment Control
GIS	Geographic Information System
GPS	Global Positioning System
HUC	Hydrologic Unit Code
IDDE	Illicit Discharge Detection and Elimination
DJJ	Department of Juvenile Justice
DJJ COU	Department of Juvenile Justice – Capital Outlay Unit
BAJCC	Bon Air Juvenile Correctional Center
DJJ OD	Department of Juvenile Justice – Operation Division
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
VPDES	Virginia Pollutant Discharge Elimination System
POC	Pollutants of Concern
PSA	Public Service Announcement
P&TS	Parking and Transportation Services
R&WM	Recycling and Waste Management
SWPPP	Stormwater Pollution Prevention Plan
SWM	Stormwater Management
TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids
VDOT	Virginia Department of Transportation
VESCL&R	Virginia Erosion and Sediment Control Law and Regulations
VESCP	Virginia Erosion and Sediment Control Program
VSMP	Virginia Stormwater Management Program
VESMP	Virginia Erosion and Stormwater Management Program
CBPA	Chesapeake Bay Preservation Act
MEP	Maximum Extent Practicable
TLNMP	Turf and Landscape Nutrient Management Plans
SPCC	Spill Prevention Control and Countermeasures

Background

Controlling the quality and quantity of stormwater in urbanized areas has become of greater concern since the passage of the Clean Water Act (CWA) in 1972. Despite earlier attempts to address water pollution, it was not until 1972 that the Environmental Protection Agency (EPA) was given the authority to develop and implement a stormwater management program, which regulates the amount of pollutants being discharged in U.S. water bodies. In 1987, the Clean Water Act was amended to include a provision addressing stormwater discharges. In response to amendments to the CWA, in 1990 the EPA created an enforcement management mechanism called the National Pollutant Discharge Elimination System (NPDES). With implementation of the NPDES, it became obligatory for all operators of Municipal Separate Storm Sewer Systems (MS4s) who intend to discharge stormwater into surface waters to obtain an NPDES permit. Depending on the size of the municipality, the NPDES issued Phase I – Individual Permit in 1990, and Phase II – small MS4 General Permit in 2003. These permits continue to be required and issued today. Phase I requires an NPDES permit for medium and large cities or municipalities with populations greater than 100,000, industrial activities, and construction activities that disturb 5 or more acres while phase II applied to smaller municipalities, typically those with a population between 10,000 and 100,000 and other operator entities not covered under Phase I. Phase II of the MS4 program emphasizes a more generalized approach to stormwater management, reflecting the common challenges faced by small, urbanized areas across the United States. Phase II mandates that NPDES permit holders establish programs and practices to manage and reduce polluted runoff from small MS4s and small construction sites.

The EPA delegated the regulatory authority and oversight of the NPDES programs to the State governments. Phase II Virginia localities are required to obtain a General Virginia Pollutant Discharge Elimination System (VPDES) MS4 permit from DEQ, which also required the annual submittal of a report detailing stormwater management efforts undertaken. As authorized under the State Water Control Law and the federal Clean Water Act, the VPDES permitting program regulates point source pollution, which is administrated by Virginia Department of Environmental Quality (DEQ).

DJJ Bon Air Campus originally obtained a Phase II permit (Permit No. VAR040128) from DEQ on April 18, 2014, with a reissue renewal date of June 30, 2018, and every 5-years thereafter. The permit has been renewed twice so far on the following dates:11/01/2018, and 11/1/2023 (current permit). The current permit will expire on October 31, 2028.

Introduction

Stormwater Management has become a particularly critical issue for urban communities. With the enactment of the Chesapeake Bay Preservation Act in 1988, Virginia initiated efforts to safeguard urban streams and waterways from erosion and pollution caused by urban development. Discharges from municipal separate storm sewer systems (MS4s) are regulated under the Virginia Stormwater Management Act, the Virginia Stormwater Management Program (VSMP) Permit regulations, and the Clean Water Act as point source discharges. The Virginia Department of Environmental Quality (DEQ) is responsible for administering and issuing the permits.

A Municipal Separate Storm Sewer System (MS4) is a network of drainage systems, including pipes, ditches, and other conveyances, designed to carry stormwater runoff directly to nearby streams, rivers, and other bodies of water. MS4 regulations were developed and implemented in two phases. Implementation of the first phase began in the early 1990s and required that operators of MS4s serving populations of greater than 100,000 people apply for and obtain a permit to discharge stormwater from their outfalls. Individual Permits are active for five years. Currently, there are the following eleven (11) localities in Virginia with a Phase I - Individual Permit: counties of Arlington, Chesterfield, Fairfax, Henrico, and Prince William and cities of Hampton, Norfolk, Virginia Beach, Portsmouth, Chesapeake, and Newport News.

The second phase of MS4 regulations became effective on March 23, 2003, and required that operators of small MS4s in "urbanized areas" (as defined by the latest decennial census) must obtain a permit to discharge stormwater from their outfalls. Stormwater discharges from Phase II (small) MS4s are regulated under the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems. Currently, there are over 100 Phase II MS4 operator entities covered in the General Permit comprised of localities, universities, state & federal hospitals and correctional facilities, public school systems, and state & federal historic lands.

DJJ Bon Air Campus has operated an MS4 program since initially registering under the General Permit on April 18, 2014. DJJ has since renewed its permit (VAR040128) on November 1, 2018, and November 1, 2023. The current permit became effective on November 1, 2023, and is set to expire on October 31, 2028. The MS4 program is administered by the Capital Outlay Unit at DJJ. Under the general permit, small MS4s are

required to develop, implement, and enforce an MS4 program plan that encompasses the following six minimum control measures (MCMs):

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff and Erosion and Sediment Control
5. Post-Construction Stormwater Management for New Development and Development on Prior Lands
6. Pollution Prevention and Good Housekeeping for Municipal Operations

MS4 programs must be designed and implemented to control the discharge of pollutants from their storm sewer system to the maximum extent practicable (MEP) in a manner that protects the water quality in nearby streams, rivers, wetlands, bays, lakes, and other water bodies.

As stated above, DJJ renewed its MS4 permit (VAR040128) on November 1, 2023 for a third 5-year cycle through October 31, 2028. Since the commencement of the permit coverage, DJJ has begun implementing permit requirements and continues to work on improving existing control measures developed to reduce the discharges of pollutants into the MS4.

Since 2013, the MS4 General Permit has included specific conditions to address impaired waters with a Total Maximum Daily Load (TMDL), covering the Chesapeake Bay TMDL and local streams TMDLs. This document outlines the plan for DJJ MS4 program to comply with the 2023- 2028 VPDES General Permit for the Discharge of Stormwater from Small MS4s. DJJ is required to develop and implement a TMDL Action Plan for the third phase Chesapeake Bay TMDL to achieve the approved pollutant reduction goals through implementations of best management practices (BMPs).

In compliance with the provisions of the Clean Water Act, as amended and pursuant to the State Water Control laws and regulations adopted pursuant thereto, DJJ as per permit number VAR040128 is authorized to discharge to surface waters within the boundaries of the Commonwealth of Virginia, except those waters specifically named in State Water Control Board regulations which prohibit such discharges. The authorized discharge shall be in accordance with the registration statement filed with the Department of Environmental Quality (DEQ), Part I - Discharge Authorization and Special

Conditions, Part II - TMDL Special Conditions, Part III – DEQ BMP Warehouse Reporting, and Part IV – Conditions Applicable to All State and VPDES Permits, as set forth in the general permit (9VAC25-890-40). Therefore, it is the intent of this document to establish and define DJJ’s MS4 program and demonstrate DJJ’s plan to meet the permit requirements through October 31, 2028. Due to the extent and scale of the new permit requirements, the general permit requires DJJ to update its MS4 Program Plan annually if needed. The Program Plan will be a “living” document, with the major updates corresponding with the annual report submittals.

Part I – Discharge Authorization and Special conditions

Roles and Responsibilities (Part I C 1. a.)

DJJ administers four separate programs related to Stormwater in compliance with the Code of Virginia. These programs are under the Virginia Erosion and Sediment Control Program (VESCP), the Virginia Chesapeake Bay Preservation Act (CBPA), the Municipal Separate Storm Sewer System (MS4) permit, and the Virginia Stormwater Management Program Construction General Permit (VSMP- CGP).

DJJ has been a Phase II Municipal Separate Storm Sewer System (small MS4) locality since 2014 and has consistently maintained its registration under the general permit. The current MS4 Permit # VAR040128 will remain valid until October 31, 2028.

The roles and responsibilities of each of DJJ’s divisions and departments in the implementation of the requirements of the permit are as follows:

DJJ Divisions and Departments	Roles and Responsibilities
Administration & Finance	Overall responsibility for management of MS4 application for permit. Executive administration of the MS4 program. Authorizing DJJ policy related to the program. Determines funding within available DJJ’s resources.
Capital Outlay Unit	Responsible for administration of the engineering contracts including MS4 program, development of BMPs & SWM facilities, maintenance of schedule milestones, directing personnel and program objectives to maximize available resources, construction site stormwater runoff control, maintenance of post-construction SMFs/BMPs, and the eventual implementation of the MS4 program as approved by DEQ.

Public Information Agency	Public Information Officer is responsible for Public Education and Outreach and Public Involvement & Participation regarding the DJJ Bon Air Campus MS4 program and the associated stormwater management plan, process, progress, and impacts.
Operations	DJJ’s Division of Operations is responsible for maintenance of buildings, grounds and SMFs/BMPs, site specific Pollution Prevention and Good Housekeeping for Municipal Operations, and for site specific Illicit Discharge Detection and Eliminations.
TRC Engineering, Inc.	Provides 3rd party SMFs/BMPs annual inspections. Helps preparing / updating MS4 related programs and forms as may be deemed necessary by DJJ or DEQ. And provides other consulting services as required by DJJ or DEQ.

Third-Party Implementation of the MS4 Program (Part I C 1. b.)

DJJ does not use another entity to implement portions of the MS4 program.

Minimum Control Measures (MCMs) (Part I C 1. c.)

The following sections describe the best management practices (BMPs) that DJJ plans to utilize and implement to meet the requirements of each MCM in Part I E.

MCM-1 (Part I E 1 f.)

Public Education and Outreach

The MS4 program at DJJ Bon Air Juvenile Correctional Center (DJJ BAJCC) seeks to alert students (interned residents) and staff on the impacts of stormwater runoff on water quality through training sessions, workshops, and the distribution of educational materials. DJJ utilizes existing programs and staff within BAJCC to implement public education activities. The Public Education and Outreach program at BAJCC uses existing forums and outreach materials established by the EPA and other agencies, in addition to training classes developed by DJJ. DJJ consistently posts informative brochures, flyers, and fact sheets about stormwater on its dedicated stormwater website and bulletin board. These materials are also disseminated to students, intern residents, and employees.

High-Priority Stormwater Issues

DJJ has identified three high-priority issues and target audiences within the BAJCC's limits in the Public Education and Outreach Plan. The intent is to provide a more definitive metric in the permit while continuing the more generalized public education and outreach efforts. DJJ has identified the following three high-priority stormwater issues that will be communicated to its target audience as part of the Public Education and Outreach.

1. Human Generated Litter
2. Illicit Discharge
3. Facilities Operations

Audience, Strategies, and measurable goals for each High-Priority Issue with Rationale for Selection

The above high-priority issues were selected because they have most directly impacted stormwater quality in BAJCC and can be effective by actions of DJJ's students and staff. The BAJCC's students (interned residents), court-involved youth, and staff (200 total, including 21 O&M staff) are the target population audience identified.

The existing program pursuing strategies in Curriculum Materials, Traditional Written Materials, Training Materials, and Electronic Media from Table 1 of the permit (VAR040128) to communicate to the DJJ's public (target audience) the high-priority stormwater issues mentioned above. The program will continue to evaluate more strategies from Table 1 during each reporting year. DJJ Bon Air is responsible for the education of teenage students (interned residents) to meet the following Standards of Learning (SOL) areas related to stormwater:

- Life Science: LS.9, LS.10, and LS.11., 7th Grade Course (ages 13-14)
- Earth Science: ES.8 & ES.10, 9th Grade Course
- Biology: BIO.8, 10th Grade Course

Human Generated Litter

Human-generated litter, comprising discarded items like plastic bottles, metal cans, food wrappers, etc., poses significant environmental and societal challenges. Litter not only mars the beauty of landscapes but also endangers wildlife through ingestion and entanglement. Moreover, it can leach harmful chemicals into soil and water,

contaminating natural resources. Reduction of human generated waste was selected as means to address stormwater and aesthetics concerns within the DJJ's MS4 service area. The reduction of human generated waste will allow for SMFs and BMPs to operate efficiently. DJJ plans to set up a stormwater education booth at Family Day events twice a year, include stormwater education in the school curriculum and have "clean-up the Campus" days involving interned residents. It should be noted that approximately all DJJ's MS4 service area is inside security fencing, which is not open to the public, therefore there is no area on campus to allow for direct public participation. However, students and staff will participate in cleaning up the Campus inside security fencing. For measurable goals, the weight (lbs.) of collected waste and number of participants will be recorded. The strategies to be used to communicate the events with participants will be curriculum materials and traditional written materials. The number of curriculum materials and traditional written materials (brochures, fact sheets, flyers) handed-out are recorded.

Illicit Discharge

Illicit discharge refers to the unauthorized release of pollutants or non-stormwater substances into a storm drain system or natural water bodies, such as rivers, lakes, and oceans. This can include a wide range of contaminants like chemicals, sewage, industrial waste, and other harmful materials. For example, oils that leaks from cars and maintenance equipment onto roads and parking lots is washed into storm drains and then flows directly to a pond or stream. DJJ chooses to target staff members with educational messages focused on prevention of fuel spills, illicit discharges, and improper handling of motor oils, anti-freeze, and other hazardous waste.

Facilities Operations

Operation and maintenance of facilities are critical at DJJ Bon Air to ensure the facilities are functioning well. A stormwater issue related to Facilities Operations involves the management and prevention of stormwater pollution at facility sites. Such issues are critical because improper handling of stormwater can lead to significant environmental and regulatory problems. DJJ Bon Air has developed a Good Housekeeping/Pollution Prevention Procedure, see Appendix A. DJJ staff receive training about the importance of stormwater management and their role in preventing pollution. To obtain more information or provide feedback on DJJ's MS4 program and stormwater management, call the DJJ Central Office at 804-371-0700; or may fax them to 804-371-6497.

MCM-2 (Part I E 2 h.)

Public Involvement and Participation

It should be noted that approximately all DJJ's MS4 service area is inside security fencing, which is not open to the public, therefore there is no area on campus to allow for direct public participation. However, DJJ encourages staff and students (interned residents) to participate in volunteer programs hosted on Bon Air campus for conservation and improvement of water resources. Educational workshops and materials, offered by DJJ to students and staff, provide information about stormwater management practices implemented on campus and different sustainable practices that can help restore and protect surface waters. At DJJ Bon Air, students and staff involvement is encouraged as they can provide valuable input and assistance to DJJ on improving the MS4 program. In many cases, their opinions can help identify problems promptly, and therefore, solutions can be accomplished in shorter time.

DJJ's procedures for Public Input

In accordance with the requirements of the permit, the public may report to DJJ, (1) potential illicit discharges, improper disposal, or spills to DJJ MS4, (2) complaints regarding land disturbing activities, or (3) other potential stormwater pollution concerns. The public is always welcome to comment on DJJ's MS4 program plan and/or other stormwater related documents.

For any of the above, please contact the Capital Outlay Unit through 804-371-0700 between 8:00 am and 5:00 pm, Monday – Friday, except State and Federal Holidays, or email robert.wilburn@djj.virginia.gov. In addition, the public can offer comments or questions by calling the DJJ Central Office at 804-371-0700 or may fax them to 804-371-6497. The above public comments procedure is also available on DJJ's MS4 website at [DJJ Capital Outlay \(virginia.gov\)](http://DJJ Capital Outlay (virginia.gov)).

Capital Outlay will respond to public comments through email replies in a timely manner. Capital Outlay will also maintain documentation of public comments (if any) and DJJ's responses until the permit expires or for 5 years, whichever comes later. This information will be available upon request.

MS4 Program Webpage

DJJ has developed a dedicated website on water quality, MS4 program, and stormwater management [DJJ Capital Outlay \(virginia.gov\)](http://DJJ Capital Outlay (virginia.gov)). The site serves as a comprehensive

resource providing information on DJJ's MS4 permit and coverage letter, MS4 program plan, MS4 maps, local and Chesapeake Bay TMDL Action Plans, and annual reports. Additionally, it acts as a platform to distribute educational materials and provides guidance on reporting potential illicit discharges, improper disposal, spills, or complaints related to land disturbing activities and stormwater pollution concerns. The website also offers opportunities for public input on DJJ's MS4 program plan and delivers water quality and pollution prevention information in an easily accessible format. Furthermore, it grants public access to important documents such as the MS4 program plan, annual reports, and the TMDL action plans.

Proposed Activities & Period of Occurrence

Public involvement activities

The permit requires DJJ to implement no less than four activities per year from two or more of the following categories listed in Table 2 of the general permit to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects: monitoring, restoration, public education activities, public meetings, disposal or collection events, and pollution prevention. DJJ Bon Air proposes the following public improvement activities each year until the permit end date to reduce stormwater pollutant loads, improve water quality, and support local restoration/clean-up efforts:

- Educational Events: Presentation of stormwater materials as part of classes to meet the Standards of Learning (SOL) requirements at least four times per year. DJJ Bon Air offers the following classes to its students:
 - Life Science: LS.9, LS.10, and LS.11., 7th Grade Course (ages 13-14)
 - Earth Science: ES.8 & ES.10, 9th Grade Course
 - Biology: BIO.8, 10th Grade Course

The number of participant students are counted and recorded for each class.

- Disposal or Collection Events: Fluorescent bulbs, waste oil, and vehicle fluids are collected on an on-going basis and picked up for disposal by a licensed waste receiver approximately once or twice per year. The number of bulbs and weight of waste should be measured.
- Community Cleanups: DJJ plans to set up a stormwater education booth at Family Day

events twice a year, include stormwater education in the school curriculum, and have “clean-up the Campus” days involving students and staff. The amount of waste collected and disposed during each year will be measured and reported in the annual reports.

MCM-3 (Part I E 3 d.)

Illicit Discharge Detection & Elimination (IDDE)

MS4 Service Area

DJJ Bon Air MS4 consists of 15 outfalls and 4 BMPs/SMFs. The MS4 map and outfall information tables are available on DJJ’s website at [DJJ Capital Outlay \(virginia.gov\)](http://DJJ.CapitalOutlay.virginia.gov). In addition, the MS4 maps and tables can be found on Appendix B and will be available to DEQ upon request.

Interconnection Correspondence

DJJ Bon Air doesn’t have any physical interconnections with adjacent MS4 permittees. Therefore, no written notification needs to be sent to other MS4s. Additionally, DJJ has not received any such notifications from other MS4s so far.

IDDE Procedures

In order to detect and eliminate both direct and indirect illicit discharges, DJJ has written and maintains, implements, and enforce Illicit Discharge Detection and Elimination (IDDE) procedures, which relies on DJJ’s website at [DJJ Capital Outlay \(virginia.gov\)](http://DJJ.CapitalOutlay.virginia.gov). The IDDE procedures can also be found in Appendix C. The IDDE has been designed to detect, identify, prohibit, and address unauthorized non-stormwater discharges, including dumping, to the MS4 and into the storm sewer system or any receiving waterway. The policy is enforced by DJJ’s Capital Outlay and Operation and Maintenance departments. Instructions on how to report concerns or potential illicit discharges are available online at the DJJ’s stormwater website [DJJ Capital Outlay \(virginia.gov\)](http://DJJ.CapitalOutlay.virginia.gov) and the procedures stated under [MCM-2](#) above. DJJ encourages the community’s contribution in discovering and reporting possible polluted runoff and maintains appropriate staffing to address such reported concerns. The number of illicit discharges (if any) will be reported each year as part of the annual report.

In addition, dry weather screenings of all 15 outfalls and 4 SMFs/BMPs at DJJ Bon Air are conducted annually using a checklist developed by the DJJ’s consultant. The checklist is included on Appendix D. The dry weather screening/inspection is performed annually by DJJ’s consultant to detect, identify, and eliminate possible illicit connections and discharges to the MS4, as well as, to keep track of all existing stormwater management

facilities and structures within the MS4. During the inspection, outfalls are also evaluated for structural damages or uncommon conditions that might indicate the present of pollutants. Outfalls are also inspected for maintenance necessity to avoid detrimental conditions on stream banks and bed. Completed inspection forms and reports will be available to DEQ upon request.

MCM-4 (Part I E 4 d.)

Construction Site Stormwater Runoff and Erosion and Sediment Control

DJJ Bon Air has not developed standards and specifications as part of Part I E 4 a (4). As a state agency, DJJ is required to comply with the current version of Virginia Construction and Professional Services Manual (CPSM) for any project that includes capital funding as are the design professionals. Section 4.17 of the CPSM (attached as Appendix E) requires compliance with all DEQ requirements for erosion and stormwater management regulations.

Ordinances & Legal Authorities Employed

The plans will be submitted to DEQ for review and approval. Contractors shall finish construction in accordance with DEQ, DEB, and DJJ approved project plans, drawings & specifications. DJJ will add language to design and construction contracts to strengthen legal authorities and compliance with approved plans.

Roles and Responsibilities for MCM-4 Compliance

DJJ Capital Outlay is responsible for all implementing erosion and sediment control and construction site stormwater runoff control requirements in Part I E 4.

Compliance Procedures

Plan Review

Plans are submitted to DEQ for review and approval. This task is performed by the Design Team and verified by the agency Project Manager.

Inspection

For projects of one or more acres of land disturbance, the Contractor submits the VPDES Registration Statement prior to land disturbance. This provides DEQ notification so that they can perform inspections as the VSMP authority. For all projects with 10,000 sf (2,500 sf in areas designated under the Chesapeake Bay Act) or greater of land

disturbance, inspections in accordance with MS4 MCM 4 are also conducted by certified inspectors of a consultant under term contract. Currently, this is TRC, Engineers, Inc. Inspections are conducted at the following intervals as required in the MS4 permit, MCM 4:

- a) During or immediately following initial installation of erosion and sediment controls;
- b) At least once per every two-week period;
- c) Within 48 hours following any runoff producing storm event; and
- d) At the completion of the project prior to the release of any performance bond.

Inspection procedures are documented on ESC inspection report form. These inspections follow the approved plan and Virginia Erosion and Stormwater Handbook, Version 1.0. The number of construction site inspections will be reported to DEQ by DJJ in each annual report. In addition, BMPs are electronically reported using DEQ BMP Warehouse in accordance with Part III B 3 of the MS4 general permit.

Compliance and Enforcement

DJJ applies enforcement actions for maintaining compliance with DEQ Erosion and Stormwater Management regulations. For all projects, the construction contract requires compliance with the ESC measures shown on the DEQ approved plans and the VSMP Construction General Permit. If the Contractor fails to comply with the listed legal authorities, DJJ Project Manager directs the Contractor to take immediate remedial action. If the contractor still fails to correct deficiencies, DJJ Bon Air can take a variety of other actions from withholding payments for ESC and SWM related items until deficiencies are corrected, to terminating the contract.

The number of enforcement activities and number of complaints will be recorded in the annual report during each year.

MCM-5 (Part I E 5 d.)

Post-Construction Stormwater Management for New Development and Development on Prior Development Lands.

As a non-traditional small MS4, DJJ has direct control over planning, design, construction, and post-construction maintenance and operation of stormwater management facilities, best management practices (BMPs), and outfalls. The MS4 program at DJJ consists of minimizing the impacts of runoff associated with land disturbance such as flooding, erosion, and water pollution. DJJ's goal is to implement cost-effective measures that provide both water quantity and quality control while complying with laws and regulations. Current practices implemented by DJJ in managing and controlling stormwater focus on promoting natural hydrologic processes as well as minimizing contact of pollutants with rainfall. As land-disturbance activities occur, DJJ implements strategies to protect and enhance natural areas both during and after the projects. DJJ is committed to minimizing impervious surfaces and increasing vegetated areas wherever feasible. Inspections of all stormwater management/BMP facilities and outfalls in BAJCC MS4 area are performed annually in accordance with state stormwater management laws and regulations, DJJ Bon Air Standard of Operations (SOP) SMF Inspection & Maintenance (Appendix F), inspection checklists (Appendix D), and MS4 general permit. Minor maintenance is conducted by Operation Division, Central Maintenance for Buildings and Grounds, and Capital Outlay Unit crews or by a contractor hired by Capital Outlay annually. Major maintenance or modifications are designed and constructed by outside firms hired by Capital Outlay. The number of SWM/BMP facilities that are repaired each year will be reported in the annual reports.

The stormwater BMP map/table is shown in Appendix B. It is also posted on MS4 website on the following link: [DJJ Capital Outlay \(virginia.gov\)](https://www.virginia.gov/capital-outlay/)

Roles and Responsibilities

DJJ-Capital Outlay is responsible for all roles and responsibilities in implementing the post-construction stormwater runoff control program.

Post-Construction SWM/BMP Inspection and Maintenance Procedures

BMP Tracking

A spreadsheet table is maintained by DJJ CO. The spreadsheet and a map showing the location of outfalls and stormwater management facilities are posted on DJJ's website at [DJJ Capital Outlay \(virginia.gov\)](http://www.djj.virginia.gov), and are shown on Appendix B as well. Annually, updates to the BMP database are uploaded to DEQ's BMP Warehouse although some BMPs are entered through the VSMP CGP database upon termination of CGP permit coverage.

BMP Inspection

Inspections are performed under a DEQ trained Stormwater Inspector. All outfalls, SWM Facilities, and BMPs are inspected annually. The inspections are done by a term-contract consultant which is currently TRC Engineers, Inc. Inspection procedures and checklists follow the DEQ training materials Inspector for SWM Participant Guide, Module 8: Post-Construction Inspections, available from the DEQ Environmental Learning Management System (ELMS) site. BMPs and stormwater management facilities are maintained throughout the year by DJJ. The number of SWM/BMP facilities that will be repaired or maintained will be added to the annual report. Normal maintenance activities include mowing, vacuum cleaning, sediment removal, and landscape maintenance.

MCM-6 (Part I E 6 x.)

Pollution Prevention and Good Housekeeping For Facilities owned or operated by the permittee within the MS4 Service Area

Written Housekeeping Procedures for the Operation & Maintenance Activities

Under the MS4 permit, DJJ is required to develop, maintain, and implement written good Housekeeping procedures/training for activities at facilities owned or operated by DJJ. These written procedures aim to reduce and prevent the discharge of pollutants into the MS4. They encompass various aspects, including activities, schedules, inspection procedures, maintenance, and corrective actions to ensure the proper performance of each facility.

DJJ's written procedures consist of "Good Housekeeping/Pollution Prevention". The responsibility for managing operation and maintenance activities lies with the DJJ, Capital Outlay Unit. The written procedure can be found in Appendix A and posted in MS4 webpage [DJJ Capital Outlay \(virginia.gov\)](https://www.virginia.gov/djj/capital-outlay).

High-Priority Facilities

There are no high-priority facilities owned or operated by BAJCC with a high potential of discharging pollutants in accordance with Part I E 6 g.

Turf and Landscape Nutrient Management Plans

Turf and Landscape Nutrient Management Plans (TLNMP) are strategies aimed at managing and reducing nutrient pollution in stormwater runoff from turf and landscape areas within urban environments. Nutrient pollution, primarily from fertilizers, can contribute to water quality issues, such as algal blooms and impaired aquatic ecosystems. However, there are no areas within the DJJ Bon Air (MS4 service area) where fertilizer or nutrients are applied; therefore, no areas require a Turf and Landscape Nutrient Management Plan.

Contractor Compliance

Even though there are no contractors to which TLNMP applies, the DJJ's written "Good Housekeeping/Pollution Prevention" procedures provide information to ensure that contractors working on behalf of DJJ implement necessary good housekeeping and pollution prevention procedures, as well as stormwater pollution plans, as appropriate. The purpose is to ensure that DJJ staff and contractors working on the DJJ Bon Air Campus adhere to MS4 and stormwater management regulations by minimizing and preventing the discharge of pollutants.

When DJJ hires contractors for construction projects, they are required to comply with MS4, erosion control, stormwater management regulations, and DJJ procedures as outlined in their individual contracts. These contracts include provisions that enforce the necessary good housekeeping and pollution prevention requirements.

Employee Training Plan

DJJ has developed written training plan for applicable field personal as part of "Good Housekeeping/Pollution Prevention" written procedures. The following activities ensure that staff members are adequately trained as per Part I E 6 d:

- DJJ Bon Air has two full time and two part time Grounds employees. They receive training by Grounds supervisor in prevention, recognition, and elimination of illicit discharges annually (item 1 in Part I E 6 d).
- No employees perform road, street, or parking lot maintenance (item 2 in Part I E 6 d); therefore, no training is required for road, street, and parking lot maintenance in good housekeeping procedures.
- No employees are emergency responders trained in spill response (item 5), so no training is required in spill control and response. DJJ Bon Air seeks assistance from local firefighters and law enforcement officers if there is a spill control.
- Employees working in and around maintenance, public works, or recreational facilities receive training in good housekeeping and pollution prevention practices associated with those facilities no less than once per 24 months.
- There are no high-priority facilities (item 4 in Part I E 6 d) with SWPPP, therefore, no training is required in SWPPP procedures.
- There is no pesticide or herbicide application (item 6); therefore, no employee is required to be trained and certified in accordance with the Virginia Pesticide Control Act.
- No employees are plan reviewers, inspectors, program administrators, or construction site operators. DEQ is the erosion and stormwater authority for DJJ.
- DJJ had their consultant present a training session on June 29, 2023, covering the materials in good housekeeping/pollution prevention and overall MS4 requirements. Fifteen (15) employees attended the training. Sign-in sheet and training materials in PowerPoint slides are available upon request. This training presentation will continue every 2 years.

DJJ maintains documentation of each training event for a minimum of three years after training activity completion. Training documentation includes PowerPoint slides, recorded videos, brochures, flyers, books, handouts, and sign-in sheets. They are available upon request. The trainings are also reported in the annual reports. DJJ Capital Outlay is responsible for tracking staff trainings to ensure everyone receives the appropriate training.

Parth II - TMDL Special Conditions

A. Chesapeake Bay TMDL Action Plan

As required by the permit, DJJ must include annual status reports on the implementation of required Chesapeake Bay Total Maximum Daily Load (TMDL). In FY16, DJJ Bon Air prepared a TMDL Action Plan for meeting the Special Condition for the Chesapeake Bay TMDL pursuant to Sections I B and 1 C of that time General Permit. The Chesapeake Bay TMDL Action Plan was updated in FY19 in anticipation of the permit renewal for the second permit cycle of the Chesapeake Bay TMDL and in response to a letter received from DEQ, dated May 22, 2019, and was requesting additional information regarding compliance with the CB TMDL provisions of DJJ Bon Air's MS4 permit (VAR040128). A draft third phase Chesapeake Bay TMDL Action Plan was submitted by DJJ to DEQ in October 2023 as part of the permit reapplication package for third permit cycle as required by the Virginia General Permit. DEQ reviewed the draft TMDL Action Plan and sent an approval letter dated May 21, 2024. As per the draft third phase CB TMDL Action Plan, DJJ had achieved compliance with the third cycle Nitrogen removal. DJJ has a phosphorus deficit of 3.13 lbs/yr that needs to be removed during third permit cycle by proposing stormwater BMPs. A final CB TMDL Action Plan, pursuant to Section II A-12 of the current General Permit, will be prepared and submitted before November 1, 2024, for the third permit cycle. The current Chesapeake Bay TMDL action plan and draft TMDL Action Plan are found at DJJ's stormwater management website located at [DJJ Capital Outlay \(virginia.gov\)](http://DJJ Capital Outlay (virginia.gov)). DJJ submits a CB TMDL implementation annual status report to DEQ no later than October 1 of each year. The report covers the previous year from July 1 to June 30.

B. Local TMDL Action Plans

The only TMDL applicable to DJJ Bon Air facility is the Chesapeake Bay TMDL. No additional TMDLs have been established for waters within DJJ Bon Air MS4 service area.

Parth III – DEQ BMP Warehouse Reporting

Annual Report and Program Evaluation

This program is to be evaluated annually by DJJ Capital Outlay personnel and its MS4 consultants to ensure compliance with all provision of the MS4 permit. Program plan revisions will take place annually as necessary or as required by DEQ.

Annual reports and Chesapeake Bay TMDL Implementation Status Reports on MS4 Program Plan updates are to be submitted for review to DEQ. The annual MS4 reports are submitted electronically by October 1st of each year. The reports cover previous year from July 1 to June 30. Copies of previously submitted Annual Reports can be reviewed on DJJ's stormwater management website [DJJ Capital Outlay \(virginia.gov\)](http://www.djj.virginia.gov),

In addition, DJJ will use DEQ BMP Warehouse to report any new BMPs and the most recent inspection date for BMPs.