

06



STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES

DIVISION FOR JUVENILE JUSTICE SERVICES
1056 NORTH RIVER ROAD, MANCHESTER, NH 03104
603-625-5471 FAX: 603-624-0512 TDD Access: 1-800-735-2964

John A. Stephen
Commissioner

Rodney H. Forey
Director

November 1, 2006

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, 2006 Annual Report.**

The NH Youth Development Center was notified on 10/26/06 that the 2006 annual report had not been received from Mr. Jeffrey M Chierepko. Subsequently, it was reported to the New Hampshire Department of Environmental Services that Mr. Chierepko was no longer employed at this facility and that the YDC Plant Maintenance Engineer was not aware that the annual report had not been generated and sent out. To that end, the Youth Development Center apologizes for not filing the annual report on time.

The 2006 annual report is based on the previous year's annual report with minor changes:

*As indicated in paragraph two, this facility has been under major construction. As of today, substantial construction is nearing completion. Full completion is anticipated in mid November 2006.

*As indicated in the Storm Water Management Program 2005 Annual Report, BMP Summary, Planned Activities, and Measurable Goals will continue as same for 2006:

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 a 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

cc:
Jeffrey Andrews, NH DES
Rodney Forey, Director, DJJS

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 Measurable Goals temporarily on hold. Per your advice during a conversation with Mr. Chierepko, we are 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 Measurable Goals will continue once construction is completed.

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 2006 Annual Report BMP Summary.
5. Activities for the next reporting cycle include BMP #s identified in the column named "Planned Activities – Permit Year 4" on the attached Storm Water Management Program 2006 Annual Report BMP Summary.
6. Changes in BMPs include those noted in paragraphs two and three above.
7. The Youth Development Center relies on no other entities for achieving any of its measurable goals.

Should you have any further questions or comments, please do not hesitate to contact me at (603) 625-5471 x310. Thank you.

Sincerely,

Richard Rousseau
Plant maintenance Engineer IV
Division for Juvenile Justice Services

cc:
Jeffrey Andrews, NH DES
Rodney Forey, Director, DJJS