

Via Electronic and US Mail - 7011 1150 0001 6024 0144

April 29, 2019

Ms. Ingrid Hopkins
Water Protection Division (3WP42)
USEPA Region III
1650 Arch Street
Philadelphia, PA 19103-3029

**Re: Benning Facility Consent Decree (Civil Action No. 1:15-cv-018450) - Quarterly
Status Reports for January - March 2019**

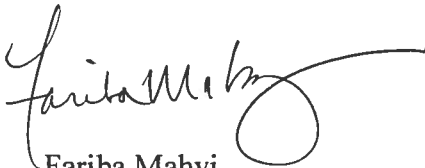
Dear Ms. Hopkins,

In accordance with Paragraph 68 of the Benning Facility Consent Decree, please find attached the following status reports for the period of January - March 2019:

1. Copies of monthly and quarterly discharge monitoring reports
2. Status of annual inspection of drainage system
3. Storm drain inlets inspection logs
4. Monthly site-wide inspection summary and logs
5. Status of Stormwater Treatment System
6. Stormwater management training
7. Stormwater pollution prevention plan updates
8. Change in management responsibilities
9. Status of completion of transformer storage shed
10. Status of Stormwater Retention Project
11. Description of non-compliance with effluent limits

Please contact me at (202) 331-6641 or fmahvi@pepco.com, if you have any questions or need additional information.

Sincerely,



Fariba Mahvi
Sr. Project Manager
Environmental Services

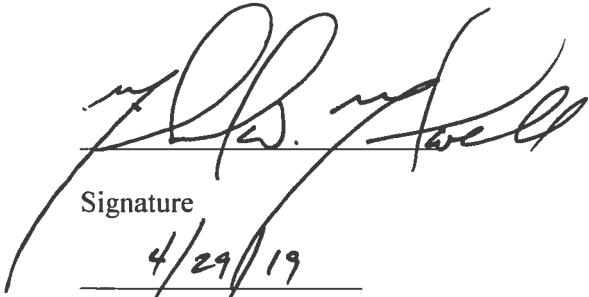
Attachments

CERTIFICATION STATEMENT

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 have no personal knowledge that the information submitted is other than 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.

Michael W. Maxwell

Vice President, Support Services



Signature

4/29/19

Date

Paragraph 68.a.(1) of the Consent Decree

Discharge Monitoring Reports

Copies of DMRs for January - March 2019 are attached.

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services
Facility: PEPCO - BENNING
Permitted Feature: 003 - External Outfall

Major: ☒
Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON, DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON, DC20019
Discharge: 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 01/01/19 to 01/31/19
Status: **NetDMR Validated**

DMR Due Date: 02/28/19

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Type

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type		
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3					
00400	pH	Smpl.											
1 - Effluent Gross						=6.89		=8.1	12 - SU	0	01/DS - Once Per Discharge	GR - GRAB	
Season: 0			Req.			>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/DS - Once Per Discharge	GR - GRAB	
NODI: -		NODI											
00530	Solids, total suspended	Smpl.											
1 - Effluent Gross						=14		=14	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB	
Season: 0			Req.				<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB	
NODI: -		NODI											
00556	Oil & Grease	Smpl.											
1 - Effluent Gross						=5.1		=5.1	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB	
Season: 0			Req.				<=15 MO AVG	<=20 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB	
NODI: -		NODI											
39496	PCB-1242	Smpl.											
1 - Effluent Gross								=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB	
Season: 0			Req.					<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB	
NODI: -		NODI											
39504	PCB-1254	Smpl.											
1 - Effluent Gross								=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB	
Season: 0			Req.					<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB	
NODI: -		NODI											
39508	PCB-1260	Smpl.											
1 - Effluent Gross								=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB	
Season: 0			Req.					<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB	
NODI: -		NODI											
50050	Flow, in conduit or thru treatment plant	Smpl.											
1 - Effluent Gross				=0.00466	=0.00466	03 - MGD		=0.00466	=0.00466	03 - MGD	0	01/DS - Once Per Discharge	MS - MEASRD
Season: 0			Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		01/DS - Once Per Discharge	MS - MEASRD
NODI: -		NODI											

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-02-14 10:47 (Time Zone:-05:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-02-14 10:48 (Time Zone:-05:00)

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Permit

Permit ID: DC0000094 **Major:** 

Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019

Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019

Permitted Feature: 003 - External Outfall **Discharge:** 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 02/01/19 to 02/28/19 **DMR Due Date:** 03/28/19

Status: **NetDMR Validated**

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William **Last Name:** Sullivan

Title: VP, Operations **Telephone:** 202-872-2942 

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Type

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00400	pH										
1 - Effluent Gross		Smpl.									
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI				C - No Discharge		C - No Discharge			
00530	Solids, total suspended										
1 - Effluent Gross		Smpl.									
Season: 0		Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
00556	Oil & Grease										
1 - Effluent Gross		Smpl.									
Season: 0		Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
39496	PCB-1242										
1 - Effluent Gross		Smpl.									
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI						C - No Discharge			
39504	PCB-1254										
1 - Effluent Gross		Smpl.									
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI						C - No Discharge			
39508	PCB-1260										
1 - Effluent Gross		Smpl.									
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI						C - No Discharge			
50050	Flow, in conduit or thru treatment plant										
1 - Effluent Gross		Smpl.									
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	01/DS - Once Per Discharge	MS - MEASRD
NODI: -		NODI	C - No Discharge	C - No Discharge			C - No Discharge	C - No Discharge			

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

There was no discharge to monitoring point 003 in February 2019.

Attachments

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-03-25 16:55 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-03-25 16:56 (Time Zone:-04:00)

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Permit

Permit ID: DC0000094 **Major:** ☒
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
 WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
 WASHINGTON , DC20019
Permitted Feature: 013 - External Outfall **Discharge:** 013-A - BNON COOLING WATER BLOWDOWN

Report Dates & Status

Monitoring Period: From 01/01/19 to 02/28/19 **DMR Due Date:** 03/28/19
Status: **NetDMR Validated**

Considerations for Form Completion**Principal Executive Officer**

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3			
50050	Flow, in conduit or thru treatment plant	Smpl.	=0.001676	=0.00795	03 - MGD				0	01/60 - Once Every 2 Months	ES - ESTIMA
1 - Effluent Gross											
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					01/60 - Once Every 2 Months	ES - ESTIMA
NODI: -		NODI									
TS000	Toxicity, Acute	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				Opt Mon DAILY AV	Opt Mon DAILY MX		2F - tox acute	01/5Y - Once Every 5 Years	24 - COMP24
NODI: -		NODI				E - Analysis Not Conducted/No Sample	E - Analysis Not Conducted/No Sample				

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

Toxicity Acute sampling requirement was completed in compliance with the permit condition. Therefore, no sampling was conducted.

Attachments

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-03-25 17:15 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-03-25 17:16 (Time Zone:-04:00)

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Permit

Permit ID: DC0000094 **Major:** ✓
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Permitted Feature: 003 - External Outfall **Discharge:** 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 03/01/19 to 03/31/19 **DMR Due Date:** 04/28/19
Status: **NetDMR Validated**

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Analysis	Type

Parameter		NODI	Quantity or Loading			Quality or Concentration				# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units			
00400	pH											
1 - Effluent Gross		Smpl.			=8		=8.13		12 - SU	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.			>=6 MINIMUM		<=8.5 MAXIMUM		12 - SU		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended											
1 - Effluent Gross		Smpl.				=2.6	=2.6		19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.				<=30 MO AVG	<=100 DAILY MX		19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease											
1 - Effluent Gross		Smpl.				<5.3	<5.3		19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.				<=15 MO AVG	<=20 DAILY MX		19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39496	PCB-1242											
1 - Effluent Gross		Smpl.					=0		28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.					<=1 DAILY MX		28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39504	PCB-1254											
1 - Effluent Gross		Smpl.					=0		28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.					<=1 DAILY MX		28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39508	PCB-1260											
1 - Effluent Gross		Smpl.					=0		28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.					<=1 DAILY MX		28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
50050	Flow, in conduit or thru treatment plant											
1 - Effluent Gross		Smpl.	=0.0041	=0.0041	03 - MGD	=0.0041	=0.0041		03 - MGD	0	01/DS - Once Per Discharge	MS - MEASRD
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	Req Mon MO AVG	Req Mon DAILY MX		03 - MGD		01/DS - Once Per Discharge	MS - MEASRD
NODI: -		NODI										

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-04-16 18:33 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-04-19 12:00 (Time Zone:-04:00)

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Permit

Permit ID: DC0000094 **Major:** ✓
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Permitted Feature: 013 - External Outfall **Discharge:** 013-Q - No Blowdown

Report Dates & Status

Monitoring Period: From 01/01/19 to 03/31/19 **DMR Due Date:** 04/28/19
Status: **NetDMR Validated**

Considerations for Form Completion

NO BLOWDOWN

Principal Executive Officer

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Analysis	Type

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type	
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3				Units
00400	pH	Smpl. Req. NODI: -				=7.34		=7.34	12 - SU	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0						>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended	Smpl. Req. NODI: -				=30		=30	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0						<=30 MO AVG		<=100 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease	Smpl. Req. NODI: -				<5.2		<5.2	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0						Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01027	Cadmium, total [as Cd]	Smpl. Req. NODI: -				=0.25		=0.25	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0						<=2.08 MO AVG		<=4.95 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01042	Copper, total [as Cu]	Smpl. Req. NODI: -				=5.15		=5.15	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0						<=5.24 MO AVG		<=13.44 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01045	Iron, total [as Fe]	Smpl. Req. NODI: -				=0.32		=0.32	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0						<=.69 MO AVG		<=1 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01051	Lead, total [as Pb]	Smpl. Req. NODI: -				=3.2		=3.2	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0						<=56.6 MO AVG		<=64.58 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01092	Zinc, total [as Zn]	Smpl. Req. NODI: -				=27.1		=27.1	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0						<=73.11 MO AVG		<=117.18 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
39496	PCB-1242	Smpl. Req. NODI: -						=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0								<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
39504	PCB-1254	Smpl. Req. NODI: -						=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0								<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units		
NODI: -		NODI									
39508	PCB-1260										
1 - Effluent Gross		Smpl.					=0		28 - ug/L	0	01/90 - Quarterly GR - GRAB
Season: 0		Req.					<=1 DAILY MX		28 - ug/L		01/90 - Quarterly GR - GRAB
NODI: -		NODI									

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

Sample was analyzed twice for Copper. The value reported on the DMR is the average of the two results.

Attachments

Name	Type	Size
AttachmentsMarch2019.pdf	pdf	79888

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-04-22 16:13 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-04-22 16:13 (Time Zone:-04:00)

Attachment 1

NPDES Permit DC 0000094

Permit Condition Part II. A

For each measurement of sample taken pursuant to the storm event monitoring requirements of this permit, the permittee shall record and report with the Discharge Monitoring Report the following information:

Storm Event Monitoring Requirements				
Outfall Number	Sample Date	Duration of Storm Event (in hours)	Rainfall Measurement (in inches)	Duration Between Measurable Storm Events (hours)
013	3/1/2019	21	0.68	110
101	3/1/2019	21	0.68	110

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction Calculations for March 1, 2019 samplings at Outfalls 013 and 101 (Manhole K).

Outlet	Parameter	Sample Date	Concentration (mg/L) (a)	Average Flow (cfs) (a)	Load (mg/d)	Maximum Daily Limit (mg/L) (c)	Maximum Daily Stormwater Discharge Concentration Goals for Metals (b)	Baseline Concentration (mg/L)	Source of Baseline Concentration (a)	Average Baseline Flow (cfs)	Baseline Load (mg/d)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration (a)	Pollutant Concentration Reduction Compared with Baseline Concentration (a)	Pollutant Load Concentration Compared with Baseline Load (a)
013Q	TSS	3/1/2019	30	0.80	679.61	100	0.0045	42	(b) Highest TSS discharge concentration from DMR data for April-June 2005	4.62	5732	70%	20%	88%
013Q	Cadmium	3/1/2019	<0.000250	0.80	0.011	0.0045	0.0045	0.00075	(b) Reasonable potential analysis concentration for stormwater DMR data for April-June 2005	7.48	0.16	100%	100%	100%
013Q	Copper ¹¹	3/1/2019	0.00515	0.80	0.12	0.0134	0.0134	0.064	(b) Highest copper discharge concentration from DMR data for April-June 2005	3.14	5.7	62%	92%	98%
013Q	Iron	3/1/2019	0.32	0.80	7.25	1.00	NA	5.90	(f) Highest iron discharge concentration from DMR data for April-June 2005	0.148	24	68%	94%	70%
013Q	Nickel	3/1/2019	0.0023	0.80	0.05	0.117 ¹¹	0.117	0.056	(b) Reasonable potential analysis concentration for stormwater DMR data for April-June 2005	0.148	0.23	98%	98%	78%
013Q	Lead	3/1/2019	0.0032	0.80	0.07	0.0645	0.0645	0.023	(f) Highest lead discharge concentration from DMR data for April-June 2005	7.48	4.9	95%	88%	96%
013Q	Zinc	3/1/2019	0.0271	0.80	0.6	0.11718	0.117	0.9	(b) Highest zinc discharge concentration from DMR data for April-June 2005	5.15	131	77%	97%	100%
013Q	PCB-1242	3/1/2019	<0.000469	0.80	0.011	No Discharge	NA	0	Quarterly DMRs for Outfall 013Q PCB Arcadis were not detected from 2005 to 2010	NA ¹¹	0 ¹¹	0%	0% ¹¹	0% ¹¹
013Q	PCB-1254	3/1/2019	<0.000469	0.80	0.011	No Discharge	NA	0	Quarterly DMRs for Outfall 013Q PCB Arcadis were not detected from 2005 to 2010	NA ¹¹	0 ¹¹	0%	0% ¹¹	0% ¹¹
013Q	PCB-1260	3/1/2019	<0.000469	0.80	0.011	No Discharge	NA	0	Quarterly DMRs for Outfall 013Q PCB Arcadis were not detected from 2005 to 2010	NA ¹¹	0 ¹¹	0%	0% ¹¹	0% ¹¹
Marble K	TSS	3/1/2019	160	0.12	544	Monitor Only	NA	41	Flow was measured in September 2011	0.223	259	NA	200%	-110%
Marble K	Cadmium	3/1/2019	0.000723	0.12	0	0.0045 ¹¹	0.0075	0.0012	Flow was measured in September 2011	0.223	0.0076	64%	40%	68%
Marble K	Copper	3/1/2019	0.079	0.12	0.268	0.0134 ¹¹	0.0134	0.093	Flow was measured in September 2011	0.223	0.59	-490%	15%	54%
Marble K	Iron	3/1/2019	4.2	0.12	14.3	Monitor Only	NA	3.8	Flow was measured in September 2011	0.223	24	-87%	-11%	41%
Marble K	Nickel	3/1/2019	0.0778	0.12	0.264	0.117 ¹¹	0.117	0.09	Flow was measured in September 2011	0.223	0.57	34%	14%	53%
Marble K	Lead	3/1/2019	0.0708	0.12	0.271	0.0645 ¹¹	0.0645	0.13	Flow was measured in September 2011	0.223	0.82	-24%	38%	67%
Marble K	Zinc	3/1/2019	0.188	0.12	0.64	0.117 ¹¹	0.117	0.57	Flow was measured in September 2011	0.223	3.6	-61%	67%	82%
Marble K	PCB-1242	3/1/2019	<0.000469	0.12	0.011	No Discharge	NA	0.011	Flow was measured in September 2011	0.223	0 ¹¹	NA	0% ¹¹	0% ¹¹
Marble K	PCB-1254	3/1/2019	<0.000469	0.12	0.011	No Discharge	NA	0.011	Flow was measured in September 2011	0.223	0 ¹¹	NA	0% ¹¹	0% ¹¹
Marble K	PCB-1260	3/1/2019	<0.000469	0.12	0.011	No Discharge	NA	0.011	Flow was measured in September 2011	0.223	0 ¹¹	NA	0% ¹¹	0% ¹¹

Prepared by JAF 4/11/2019
Checked by ASC 4/11/2019

Source: 2019 First Quarter 2019 Sample Analytical Results, Meridian Laboratories, Inc.
(a) NPDES 2009 Permit for Banning Generating Station
(b) NPDES 2009 Permit for Banning Generating Station
(c) Maximum Daily Limit listed in the 2008 NPDES Permit

Notes:
mg/L: milligrams per liter
mg/s: milligrams per second
NA: Not applicable

¹¹ Pollutant concentration was not detected. Concentration used in pollutant load calculation is set to zero.
¹² Flow was measured when samples were collected.
¹³ Not required by 2008 NPDES Permit for Banning Generating Station.
¹⁴ Flow was measured when samples were collected.
¹⁵ No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Goals for Metals listed in Section VIII E of the 2008 NPDES Permit for Banning Generating Station.
¹⁶ Marble K has no maximum daily limit for the constituent and is monitoring only. Value listed is the Maximum Daily Stormwater Discharge Concentration Goals for Metals listed in Section VIII E of the 2008 NPDES Permit for Banning Generating Station.
¹⁷ Positive values indicate that the March 2019 concentrations are lower than the maximum daily limit for the pollutants.
¹⁸ There were no detections of PCBs in 2009. Therefore, a baseline low was not established.
¹⁹ Baseline concentrations are based on the highest reported DMR for Outfall 013Q from 2005 to 2007. TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the July-September 2009 to 2010 DMRs for Outfall 013Q.
²⁰ Sample was run by the laboratory. The two results were 0.0050 and 0.0051 mg/L, an average of the two results was used for calculation.

Permit

Permit ID: DC0000094 **Major:** ✓
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Permitted Feature: 101 - External Outfall **Discharge:** 101-Q - (no description)

Report Dates & Status

Monitoring Period: From 01/01/19 to 03/31/19 **DMR Due Date:** 04/28/19
Status: **NetDMR Validated**

Considerations for Form Completion

These discharges shall be monitored at manhole K for outfall 101.

Principal Executive Officer

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	Ex.	Type

Parameter		NODI	Quantity or Loading			Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH											
1 - Effluent Gross		Smpl.				=7.33		=7.33	12 - SU	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended											
1 - Effluent Gross		Smpl.				=160		=160	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease											
1 - Effluent Gross		Smpl.				<5.2		<5.2	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00980	Iron, total recoverable											
1 - Effluent Gross		Smpl.				=4.2		=4.2	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01027	Cadmium, total [as Cd]											
1 - Effluent Gross		Smpl.				=0.723		=0.723	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01042	Copper, total [as Cu]											
1 - Effluent Gross		Smpl.				=79		=79	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01051	Lead, total [as Pb]											
1 - Effluent Gross		Smpl.				=79.8		=79.8	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01067	Nickel, total [as Ni]											
1 - Effluent Gross		Smpl.				=77.8		=77.8	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01092	Zinc, total [as Zn]											
1 - Effluent Gross		Smpl.				=188		=188	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
39496	PCB-1242											
1 - Effluent Gross		Smpl.				=0		=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.										

Parameter Code Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
		Value 1	Value 2	Units	Value 1	Value 2	Value 3			
						Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -	NODI									
39504 PCB-1254	Smpl.					=0	=0	28 - ug/L	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross										
Season: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -	NODI									
39508 PCB-1260	Smpl.					=0	=0	28 - ug/L	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross										
Season: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -	NODI									
50050 Flow, in conduit or thru treatment plant	Smpl.					=0.0775	=0.0775	03 - MGD	01/90 - Quarterly	ES - ESTIMA
1 - Effluent Gross										
Season: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	01/90 - Quarterly	ES - ESTIMA
NODI: -	NODI									
TS000 Toxicity, Acute	Smpl.									
1 - Effluent Gross										
Season: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	2F - tox acute	01/SY - Once Every 5 Years	24 - COMP24
NODI: -	NODI					E - Analysis Not Conducted/No Sample	E - Analysis Not Conducted/No Sample			

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

Toxicity Acute sampling requirement was met in compliance with the permit condition. Therefore, no sampling was conducted.

Attachments

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-04-22 16:29 (Time Zone: -04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-04-22 16:30 (Time Zone: -04:00)

Attachment 1

NPDES Permit DC 0000094

Permit Condition Part II. A

For each measurement of sample taken pursuant to the storm event monitoring requirements of this permit, the permittee shall record and report with the Discharge Monitoring Report the following information:

Storm Event Monitoring Requirements				
Outfall Number	Sample Date	Duration of Storm Event (in hours)	Rainfall Measurement (in inches)	Duration Between Measurable Storm Events (hours)
013	3/1/2019	21	0.68	110
101	3/1/2019	21	0.68	110

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction Calculations for March 1, 2019 samplings at Outfalls 013 and 101 (Manhole K).

Outlet	Parameter	Sample Date	Concentration (mg/L) (a)	Average Flow (cfs) ^(b)	Load (mg/s)	Maximum Daily Stormwater Discharge Concentrations (mg/L) (c)	Maximum Daily Stormwater Discharge Concentrations Goals for Metals (b)	Baseline Concentration (mg/L)	Source of Baseline Concentration ^(a,c)	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Maximum Daily Concentration ^(a)	Pollutant Concentration Reported with Baseline Concentration ^(a)	Pollutant Load Compared with Baseline Load ^(a)
010130	TSS	3/1/2019	30	0.80	679.61	100	100	42	(b) Highest TSS discharge concentration from DMR data for Oct-Dec 2010. TSS was not reported on DMRs for Jan-Mar 2009. Flow was measured in October 2010.	4.82	5732	70%	20%	66%
010130	Cadmium	3/1/2019	<0.000250	0.80	0.0 ^(a)	0.00465	0.0045	0.00075	(b) Reasonable potential for cadmium discharge concentration from DMR data for Oct-Dec 2010. TSS was not reported on DMRs for Jan-Mar 2009. Flow was measured in October 2010.	7.48	0.16	100%	100%	100%
010130	Copper ⁽¹⁾	3/1/2019	0.02615	0.80	0.12	0.01344	0.0134	0.064	(b) Reasonable potential for copper discharge concentration from DMR data for Oct-Dec 2010. TSS was not reported on DMRs for Jan-Mar 2009. Flow was measured in October 2010.	3.14	5.7	62%	92%	66%
010130	Iron	3/1/2019	0.32	0.80	7.25	1.00	NA	5.80	(f) Highest iron discharge concentration from DMR data for Oct-Dec 2010. TSS was not reported on DMRs for Jan-Mar 2009. Flow was measured in October 2010.	0.148	24	68%	94%	70%
010130	Nickel	3/1/2019	0.0023	0.80	0.05	0.117 ^(a)	0.117	0.056	(b) Reasonable potential for nickel discharge concentration from DMR data for Oct-Dec 2010. TSS was not reported on DMRs for Jan-Mar 2009. Flow was measured in October 2010.	0.148	0.23	98%	98%	78%
010130	Lead	3/1/2019	0.0032	0.80	0.07	0.06458	0.0645	0.023	(f) Highest lead discharge concentration from DMR data for Oct-Dec 2010. TSS was not reported on DMRs for Jan-Mar 2009. Flow was measured in October 2010.	7.48	4.9	95%	98%	99%
010130	Zinc	3/1/2019	0.0271	0.80	0.6	0.11719	0.117	0.9	(b) Highest zinc discharge concentration from DMR data for Oct-Dec 2010. TSS was not reported on DMRs for Jan-Mar 2009. Flow was measured in October 2010.	5.15	131	77%	97%	100%
010130	PCB-1542	3/1/2019	<0.000469	0.80	0.0 ^(a)	No Discharge	NA	0	Quarterly DMRs for Outlet 0130. PCB Aroclors were not detected from 2005 to 2010.	NA ^(a)	0 ^(a)	0%	0% ^(a)	0% ^(a)
010130	PCB-1254	3/1/2019	<0.000469	0.80	0.0 ^(a)	No Discharge	NA	0	Quarterly DMRs for Outlet 0130. PCB Aroclors were not detected from 2005 to 2010.	NA ^(a)	0 ^(a)	0%	0% ^(a)	0% ^(a)
010130	PCB-1260	3/1/2019	<0.000469	0.80	0.0 ^(a)	No Discharge	NA	0	Quarterly DMRs for Outlet 0130. PCB Aroclors were not detected from 2005 to 2010.	NA ^(a)	0 ^(a)	0%	0% ^(a)	0% ^(a)
Marineole K	TSS	3/1/2019	160	0.12	544	Monitor Only	NA	41	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	259	NA	-200%	-110%
Marineole K		3/1/2019	0.000723	0.12	0	0.0045 ^(a)	0.0075	0.0012	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	0.00716	84%	40%	60%
Marineole K	Copper	3/1/2019	0.079	0.12	0.268	0.0134 ^(a)	0.0134	0.063	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	0.59	-480%	15%	54%
Marineole K	Iron	3/1/2019	4.2	0.12	14.3	Monitor Only	NA	3.8	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	24	-877%	-11%	-41%
Marineole K	Nickel	3/1/2019	0.0778	0.12	0.264	0.117 ^(a)	0.117	0.09	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	0.37	34%	14%	53%
Marineole K	Lead	3/1/2019	0.0768	0.12	0.271	0.0645 ^(a)	0.0645	0.13	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	0.82	-24%	36%	67%
Marineole K	Zinc	3/1/2019	0.188	0.12	0.64	0.117 ^(a)	0.117	0.57	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	3.6	-61%	67%	82%
Marineole K	PCB-1542	3/1/2019	<0.000469	0.12	0.0 ^(a)	No Discharge	NA	0.0 ^(a)	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	0 ^(a)	NA	0% ^(a)	0% ^(a)
Marineole K	PCB-1254	3/1/2019	<0.000469	0.12	0.0 ^(a)	No Discharge	NA	0.0 ^(a)	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	0 ^(a)	NA	0% ^(a)	0% ^(a)
Marineole K	PCB-1260	3/1/2019	<0.000469	0.12	0.0 ^(a)	No Discharge	NA	0.0 ^(a)	Third Quarter 2011 DMR for Marineole K ^(a) . Flow was measured in September 2011.	0.223	0 ^(a)	NA	0% ^(a)	0% ^(a)

Prepared by JAF 4/11/2019
Checked by ASC 4/11/2019

Sources:
(a) Microbac, 2019 First Quarter 2019 Sample Analytical Results. Microbac Laboratories, Inc.
United States Environmental Protection Agency. Effective July 19, 2009.

Notes:
 cfs - cubic feet per second
 mg/L - milligrams per liter
 mg/s - milligrams per second
 N/A - Not applicable

1) Pollutant concentration was not detected. Concentration used in pollutant load calculation is set to zero

(2) Flow was measured when samples were collected

⁽¹⁾ Not required by 2009 NPDES Permit for Benning Generating Station

⁽¹⁾ Data from the September 5, 2011 sampling event for Marshhole K was established as the baseline load because it was collected from Marshhole K. Flow was estimated based on the storm intensity and catchment area, as collected from Marshhole K. Flow was estimated based on the storm intensity and catchment area, as collected from Marshhole K.

d) No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentrations Goal. sample could be collected from Marjorie K. flow was estimated based on the storm intensity and catch

Marble K has no maximum daily limit for the constituent and is monitoring only. Value listed is the Maximum Contaminant Level Goal (MCLG). For constituents with MCLGs, the MCLG is the maximum level of the constituent in drinking water that is expected to be safe over a lifetime of consumption. For constituents with MCLGs, the MCLG is the maximum level of the constituent in drinking water that is expected to be safe over a lifetime of consumption. For constituents with MCLGs, the MCLG is the maximum level of the constituent in drinking water that is expected to be safe over a lifetime of consumption.

¹⁷⁾ Positive values indicates that the March 2019 concentrations are lower than the maximum daily limit for t

a) Positive values indicate that the March 2019 concentrations are lower than the baseline concentrations

8) There were no detections of PCB Anclors. Therefore, a baseline flow was not established. However, given

Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 013Q from 2001 to 2003.

Sample was return by the laboratory. The two results were 0.053 mg/L and 0.053 mg/L, an average of the two.

Permit

Permit ID: DC0000094 **Major:** ✓
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Permitted Feature: 201 - External Outfall **Discharge:** 201-A - INTERNAL MONITORING PT. 201

Report Dates & Status

Monitoring Period: From 01/01/19 to 03/31/19 **DMR Due Date:** 04/30/19
Status: **NetDMR Validated**

Considerations for Form Completion

OIL/WATER SEPARATOR, DEMINERALIZERREGENERATION WASTEWATER,BOILER BLOWDOWN, SUMP FOR GROUNDWATER INFILTRATION,
FIRESIDEWASHING

Principal Executive Officer

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis Type

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type	
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH											
1 - Effluent Gross		Smpl.				=7.93		=7.93	12 - SU	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended											
1 - Effluent Gross		Smpl.				=7		=7	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease											
1 - Effluent Gross		Smpl.				<5.2		<5.2	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.					<=10 MO AVG	<=15 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
39496	PCB-1242											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
39504	PCB-1254											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
39508	PCB-1260											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
50050	Flow, in conduit or thru treatment plant											
1 - Effluent Gross		Smpl.	=0.001813	=0.0147	03 - MGD		=0.001813	=0.0147	03 - MGD	0	01/90 - Quarterly	ES - ESTIMA
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		01/90 - Quarterly	ES - ESTIMA
NODI: -		NODI										

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-04-22 15:41 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-04-22 15:44 (Time Zone:-04:00)

©2008 NetDMR

Permit

Permit ID: DC0000094 **Major:** ✓
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Permitted Feature: 201 - External Outfall **Discharge:** 201-B - HYDROSTATIC TESTING TANKS

Report Dates & Status

Monitoring Period: From 01/01/19 to 03/31/19 **DMR Due Date:** 04/30/19
Status: **NetDMR Validated**

Considerations for Form Completion**Principal Executive Officer**

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3			

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00310	BOD, 5-day, 20 deg. C	Smpl.									
1 - Effluent Gross											
Season: 0		Req.					<=30 MO AVG	<=60 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
00400	pH	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI				C - No Discharge		C - No Discharge			
00530	Solids, total suspended	Smpl.									
1 - Effluent Gross											
Season: 0		Req.					<=30 MO AVG	<=60 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
00556	Oil & Grease	Smpl.									
1 - Effluent Gross											
Season: 0		Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
34030	Benzene	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				<=1 MO AVG			19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI				C - No Discharge					
50050	Flow, in conduit or thru treatment plant	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						<=.5 DAILY MX	03 - MGD	99/99 - Continuous	MS - MEASRD
NODI: -		NODI						C - No Discharge			
50060	Chlorine, total residual	Smpl.									
1 - Effluent Gross											
Season: 0		Req.					<=.1 MO AVG		19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					C - No Discharge				

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

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Report Last Signed By

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Date/Time: 2019-04-16 19:16 (Time Zone:-04:00)

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Permit

Permit ID:	DC0000094	Major:	✓
Permittee:	PEPCO Environment Management Services	Permittee Address:	701 Ninth Street, NW, Room 6219 WASHINGTON , DC20019
Facility:	PEPCO - BENNING	Facility Location:	3300 BENNING ROAD, N.E. WASHINGTON , DC20019
Permitted Feature:	202 - External Outfall	Discharge:	202-A - COOLING TOWER BLOWDOWN

Report Dates & Status

Monitoring Period:	From 01/01/19 to 03/31/19	DMR Due Date:	04/30/19
Status:	NetDMR Validated		

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name:	William	Last Name:	Sullivan
Title:	VP, Operations	Telephone:	202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis Type

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00010	Temperature, water deg. centigrade	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						<=2.8 DAILY MX	04 - deg C	01/90 - Quarterly	MS - MEASRD
NODI: -		NODI						C - No Discharge			
00400	pH	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU	01/90 - Quarterly	GR - GRAB
NODI: -		NODI				C - No Discharge		C - No Discharge			
01034	Chromium, total [as Cr]	Smpl.									
2 - Effluent Net											
Season: 0		Req.					<=.2 MO AVG	<=.2 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
01092	Zinc, total [as Zn]	Smpl.									
2 - Effluent Net											
Season: 0		Req.					<=1 MO AVG	<=1 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
39496	PCB-1242	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
39504	PCB-1254	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
39508	PCB-1260	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
50050	Flow, in conduit or thru treatment plant	Smpl.									
1 - Effluent Gross											
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					MEASD - Measured	CN - CONTIN
NODI: -		NODI	C - No Discharge	C - No Discharge							
50064	Chlorine, free available	Smpl.									
1 - Effluent Gross											
Season: 0		Req.					<=.2 MO AVG	<=.5 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
71871		Smpl.									

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3			
	Bromine, reported as the element										
1 - Effluent Gross											
Season: 0		Req.				Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI				C - No Discharge	C - No Discharge				

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
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 E-Mail: fmahvi@pepco.com
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Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-04-16 19:13 (Time Zone:-04:00)

Permit

Permit ID: DC0000094 **Major:** ✓
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
 WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
 WASHINGTON , DC20019
Permitted Feature: 202 - External Outfall **Discharge:** 202-B - COOLING TOWER BASIN WASH WATER

Report Dates & Status

Monitoring Period: From 01/01/19 to 03/31/19 **DMR Due Date:** 04/30/19
Status: **NetDMR Validated**

Considerations for Form Completion

COOLING TOWER UNITS 15 & 16

Principal Executive Officer

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00400	pH	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.					>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU	01/90 - Quarterly	GR - GRAB
NODI: -	NODI					C - No Discharge		C - No Discharge			
00530	Solids, total suspended	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.						<=30 MO AVG	<=100 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI: -	NODI					C - No Discharge		C - No Discharge			
39496	PCB-1242	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.							<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -	NODI							C - No Discharge			
39504	PCB-1254	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.							<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -	NODI							C - No Discharge			
39508	PCB-1260	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.							<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -	NODI							C - No Discharge			
50050	Flow, in conduit or thru treatment plant	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.	Req Mon MO AVG		Req Mon DAILY MX	03 - MGD					01/90 - Quarterly	ES - ESTIMA
NODI: -	NODI	C - No Discharge		C - No Discharge							

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

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Report Last Signed By

User: FARIBA12
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Date/Time: 2019-04-16 19:14 (Time Zone: -04:00)

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Permit

Permit ID: DC0000094 **Major:** ✓
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Permitted Feature: 203 - External Outfall **Discharge:** 203-A - COOLING TOWER BLOW DOWN

Report Dates & Status

Monitoring Period: From 01/01/19 to 03/31/19 **DMR Due Date:** 04/30/19
Status: **NetDMR Validated**

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Analysis	Type

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00010	Temperature, water deg. centigrade	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						<=2.8 DAILY MX	04 - deg C	01/90 - Quarterly	MS - MEASRD
NODI: -		NODI						C - No Discharge			
00400	pH	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU	01/90 - Quarterly	GR - GRAB
NODI: -		NODI				C - No Discharge		C - No Discharge			
01034	Chromium, total [as Cr]	Smpl.									
2 - Effluent Net											
Season: 0		Req.					<=.2 MO AVG	<=.2 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
01092	Zinc, total [as Zn]	Smpl.									
2 - Effluent Net											
Season: 0		Req.					<=1 MO AVG	<=1 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
39496	PCB-1242	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
39504	PCB-1254	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
39508	PCB-1260	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
50050	Flow, in conduit or thru treatment plant	Smpl.									
1 - Effluent Gross											
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					MEASD - Measured	CN - CONTIN
NODI: -		NODI	C - No Discharge	C - No Discharge							
50064	Chlorine, free available	Smpl.									
1 - Effluent Gross											
Season: 0		Req.					<=.2 MO AVG	<=.5 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
71871		Smpl.									

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3			
	Bromine, reported as the element										
1 - Effluent Gross											
Season: 0		Req.				Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI				C - No Discharge	C - No Discharge				

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

User: FARIBA12
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Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-04-16 19:08 (Time Zone:-04:00)

Permit

Permit ID: DC0000094 **Major:** ✓
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
 WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
 WASHINGTON , DC20019
Permitted Feature: 203 - External Outfall **Discharge:** 203-B - COOLING TOWER BASIN WASH WATER

Report Dates & Status

Monitoring Period: From 01/01/19 to 03/31/19 **DMR Due Date:** 04/30/19
Status: **NetDMR Validated**

Considerations for Form Completion**Principal Executive Officer**

First Name: William **Last Name:** Sullivan
Title: VP, Operations **Telephone:** 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00400	pH	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU	01/90 - Quarterly	GR - GRAB
NODI: -		NODI				C - No Discharge		C - No Discharge			
00530	Solids, total suspended	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				<=30 MO AVG		<=100 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI				C - No Discharge		C - No Discharge			
39496	PCB-1242	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
39504	PCB-1254	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
39508	PCB-1260	Smpl.									
1 - Effluent Gross											
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI						C - No Discharge			
50050	Flow, in conduit or thru treatment plant	Smpl.									
1 - Effluent Gross											
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					01/90 - Quarterly	ES - ESTIMA
NODI: -		NODI	C - No Discharge	C - No Discharge							

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

Report Last Saved By**PEPCO Environment Management Services**

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Date/Time: 2019-04-16 19:11 (Time Zone:-04:00)

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Paragraph 68.a.(2) of the Consent Decree

Annual Inspection of the Drainage System

Pepco is currently working with Flipppo Construction to complete the repair/replacement work on the drainage system identified from the CCTV inspection conducted between February 26 and April 18, 2018. The work on the major repair/replacement of the drainage system (Phase I) was completed in December 2018. A summary of this work was provided in the fourth quarter 2018 status report.

The remaining work (Phase II) involves repair/replacement of structural defects observed at the storm drain laterals between inlets 13 to 20 and inlet 15 to the Lift Station. Work on this phase of the project has been delayed due to discovery of unknown underground utility lines and left over concrete footings from the demolition of the power plant. A summary of the work completed to date is provided below, and the locations are identified by number 3 blue triangles in the attached figure:

The existing 21 inch pipe between inlets 20 and 15 was replaced with a new 24 inch HDPE (high density polyethylene) pipe.

The existing 18 inch pipes between inlets 15 and 14 and 14 and 13 were replaced with new 18" HDPE pipes.

The existing structures for inlets 13, 15 and 17 were replaced with new inlets.

The existing 24 inch pipe between inlets 15 and 18 and 18 and 17 were replaced with new 24 inch HDPE pipe.

The existing 24 inch pipe between inlet 17 and Flow Splitter 6 (FS6) and FS6 and inlet 27 were replaced with a new 24 inch HDPE pipe.

A 70 feet section of the pipe downstream of inlet 27 to the Lift Station (prior to the transmission tower) is currently being replaced with a new 30-inch HDPE pipe.

The phase II work is expected to be completed in early May. The annual CCTV inspection of the drainage system for 2019 is scheduled to be conducted during the second quarter. A progress on completion of the repair work and annual CCTV inspection will be provided in the next quarterly status report.

LEGEND

- PROPERTY BOUNDARY
- SURVEYED IN FLOW DRAIN
- SURVEYED STORM DRAIN
- UNSURVEYED STORM DRAIN
- UNSURVEYED STORM DRAIN
- FLOW DIRECTION
- STORM STRUCTURE NAME



FIGURE TITLE

FIGURE 3
OBSERVATIONS FROM CCTV
INSPECTION

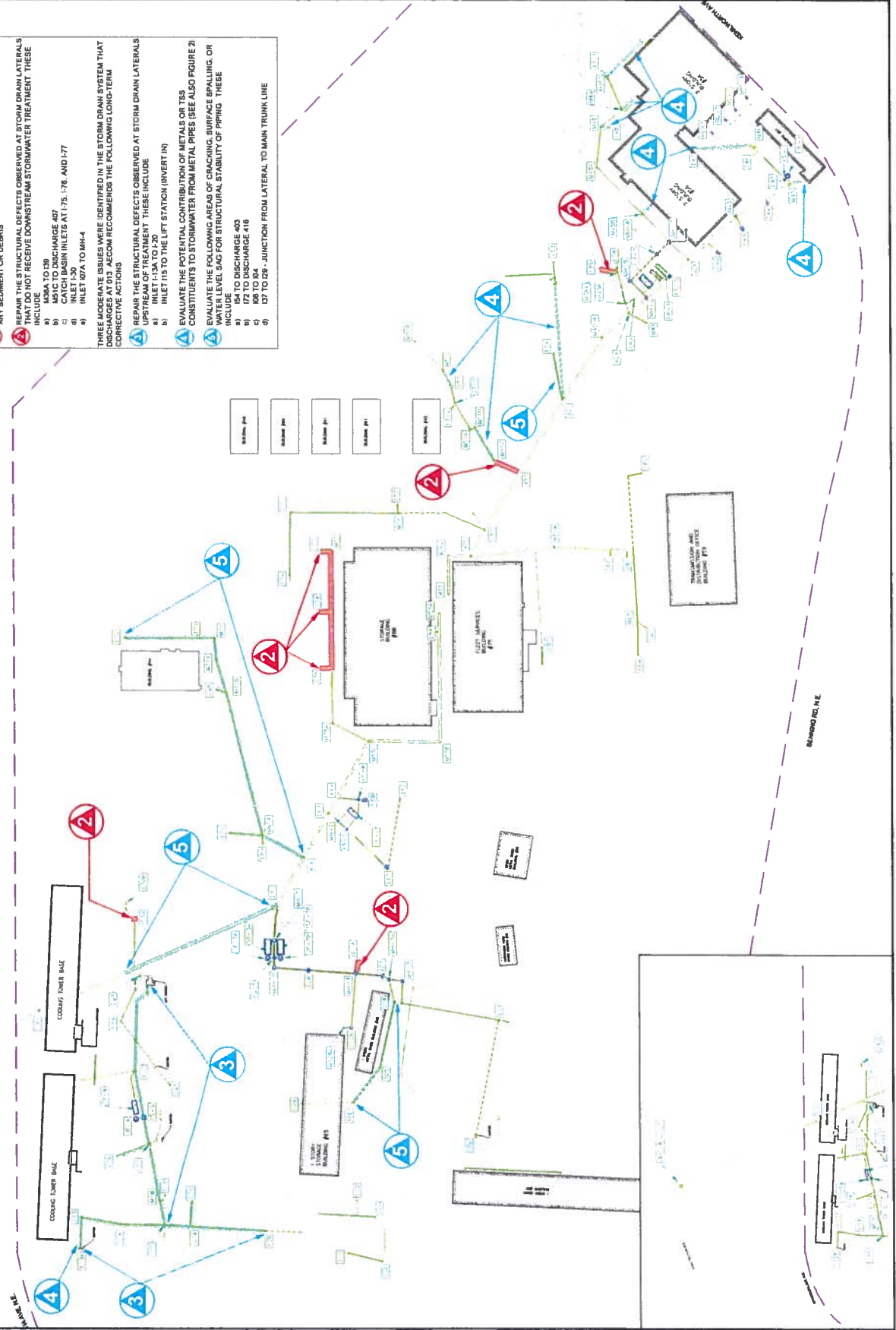
RECOMMENDATIONS

TWO SIGNIFICANT ISSUES WERE IDENTIFIED IN THE STORM DRAIN SYSTEM THAT DISCHARGES AT OUTFALL 013. AECOM RECOMMENDS THE FOLLOWING SHORT-TERM CORRECTIVE ACTIONS:

- 1. ANNUAL SITE-SPECIFIC CLEANING OF THE STORM DRAIN SYSTEM TO REMOVE ANY SEDIMENT OR DEBRIS
- 2. REPAIR THE STRUCTURAL DEFECTS OBSERVED AT STORM DRAIN LATERALS DISCHARGING AT OUTFALL 013. AECOM RECOMMENDS THE FOLLOWING LONG-TERM CORRECTIVE ACTIONS:
 - a) MSHA TO DISCHARGE 407
 - b) MSHA TO DISCHARGE 407
 - c) MSHA TO DISCHARGE 407
 - d) MSHA TO DISCHARGE 407
 - e) MSHA TO DISCHARGE 407

THREE MODERATE ISSUES WERE IDENTIFIED IN THE STORM DRAIN SYSTEM THAT DISCHARGES AT OUTFALL 013. AECOM RECOMMENDS THE FOLLOWING LONG-TERM CORRECTIVE ACTIONS:

- 1. REPAIR THE STRUCTURAL DEFECTS OBSERVED AT STORM DRAIN LATERALS DISCHARGING AT OUTFALL 013. AECOM RECOMMENDS THE FOLLOWING LONG-TERM CORRECTIVE ACTIONS:
 - a) INLET 115 TO THE LIFT STATION (INVERT IN)
 - b) INLET 115 TO THE LIFT STATION (INVERT IN)
 - c) INLET 115 TO THE LIFT STATION (INVERT IN)
 - d) INLET 115 TO THE LIFT STATION (INVERT IN)
 - e) INLET 115 TO THE LIFT STATION (INVERT IN)
- 2. EVALUATE THE POTENTIAL CONTRIBUTION OF METALS OR TSS CONSTITUENTS TO STORMWATER FROM METAL PIPES (SEE ALSO FIGURE 2)
- 3. EVALUATE THE FOLLOWING AREAS OF CRACKING, SURFACE SPALLING, OR WATER LEVEL SAG FOR STRUCTURAL STABILITY OF PIPING. THESE INCLUDE:
 - a) 154 TO DISCHARGE 403
 - b) 154 TO DISCHARGE 403
 - c) 154 TO DISCHARGE 403
 - d) 154 TO DISCHARGE 403
 - e) 154 TO DISCHARGE 403



Paragraph 68.a.(3) of the Consent Decree

Storm Drain Inlets Inspection Logs

The inspection logs for January - March 2019 are attached.

KENNY GUIDES

[illegible]

Weekly Inspection of Drain Guards 2019

[illegible]

KENNY GUILLES

[illegible]

Paragraph 68.a.(4) of the Consent Decree

Monthly Site Inspections

The site-wide inspection logs for January - March 2019 are attached. As part of the on-going effort to maintain good housekeeping practices at the site, Benning operating areas continue to identify equipment and materials that are no longer in use or have the potential to contribute to pollutant loading at the site (i.e., leftover construction materials, cable reels, etc.) and remove them from the site.

Transformer Storage Shed

Construction was completed by December 31, 2016 and the facility was placed in operation. The storage shed has been operating as designed for temporary storage of off-line and removed from service transformers and other electrical equipment while awaiting recycling or disposal.

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Inspection Date: 1-28-2019

Inspection Time: 10:00 AM

Inspector: M. Backs

Inspector's Signature: Maurice Backs

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Good Housekeeping Procedures											
Are outside work areas clean, dry, and free of litter and debris?	✓		✓				✓		✓		
Is the grass and plants properly maintained in the area?		✓		✓		✓		✓		✓	Need Stages to Remove unused materials.
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?		✓		✓				✓		✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are catch basins in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓				✓		✓	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		

WYATT BANKS
1-28-2019

Pepco - Benning Road Facility

Site Wide Monthly Inspection Report

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
 Have all spills been properly cleaned up and disposed of properly in the respective area?	✓				✓			✓		✓	
Structural Control Devices											
Has the vehicle wash catch basin been inspected for sediment build-up?	✓				✓			✓			
Is the wash water captured properly -- not entering storm drain system?	✓				✓			✓			
Erosion and Sediment Controls											
Is there any soil erosion, dust or sediment build-up entering the storm drain inlets?	✓		✓		✓			✓			
Are there uncovered pile of soil or junk metal equipment in the area?		✓				✓		✓		✓	
Other Indicators of Illicit Discharges											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓				✓			✓			

Pepco – Benning Road Facility

Site Wide Monthly Inspection Report

Inspection Date: 2-15-2019

Inspector: M. Banks

Inspection Time: 10:01 AM

Inspector's Signature: J. Maurice Banks

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Good Housekeeping Procedures											
Are outside work areas clean, dry, and free of litter and debris?		✓		✓	✓		✓		✓		Remove Rust Debris from Area
Is the grass and plants properly maintained in the area?		✓		✓		✓		✓		✓	Grass needs to be cut
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?		✓		✓		✓		✓		✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		

Maurice Banks
2-15-2019

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
 Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		✓		
Structural Control Devices											
Has the vehicle wash catch basin been inspected for sediment build-up?	✓		✓		✓		✓		✓		
Is the wash water captured properly -- not entering storm drain system?	✓		✓		✓		✓		✓		
Erosion and Sediment Controls											
Is there any soil erosion, dust or sediment build-up entering the storm drain inlets?	✓		✓		✓		✓		✓		
Are there uncovered pile of soil or junk metal equipment in the area?		✓		✓		✓		✓		✓	
Other Indicators of Illicit Discharges											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		✓		

**Pepco – Benning Road Facility
Site Wide Monthly Inspection Report**

Inspection Date: 3-15-2019

Inspection Time: 16:00 A.M.

Inspector: M. B. Baker

Inspector's Signature: M. B. Baker



	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Good Housekeeping Procedures											
Are outside work areas clean, dry, and free of litter and debris?	✓		✓		✓		✓		✓		all Debris has been removed
Is the grass and plants properly maintained in the area?		✓		✓		✓		✓		✓	
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?		✓		✓		✓		✓		✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		

Maquice Danks
3.15.2019

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
 Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		✓		
Structural Control Devices											
Has the vehicle wash catch basin been inspected for sediment build-up?	✓		✓		✓		✓		✓		
Is the wash water captured properly -- not entering storm drain system?	✓		✓		✓		✓		✓		
Erosion and Sediment Controls											
Is there any soil erosion, dust or sediment build-up entering the storm drain inlets?	✓		✓		✓		✓		✓		
Are there uncovered pile of soil or junk metal equipment in the area?		✓		✓		✓		✓		✓	
Other Indicators of Illicit Discharges											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		✓		

Paragraph 68.a.(5) of the Consent Decree

Status of Stormwater Treatment System

The construction of the stormwater treatment system was completed in December 2017, and the system was placed in operation. In accordance with paragraph 39 of the Benning Consent Decree, Pepco conducted Acceptance Testing of the stormwater treatment system to ensure the system meets its performance objectives in accordance with the Stormwater Treatment System Design Report. The initial acceptance testing was conducted during the first and second quarters 2018.

The analytical results of the first and second quarter 2018 sampling at Outfall 013 indicated that the treatment system was not functioning as expected. A Compliance Action Plan was prepared by AECOM (the consultant who designed the stormwater treatment system) to evaluate the performance of the system, and to identify and implement corrective actions to ensure that the treatment system is functioning as intended in compliance with the NPDES permit limits. The plan was submitted to EPA on June 4, 2018. Table 1 of the Plan summarized the specific action items completed or underway at that time.

Table 1 has been periodically updated and provided to EPA as the action items were completed. The last update was provided to EPA on February 25, 2019 (see attached). Since then, AECOM has re-run the flow model for each hotspot based on additional data provided by CONTECH (the filtration equipment supplier) for their proprietary treatment units. Based on this more detailed and site-specific hydraulic model, AECOM developed a set of proposed adjustments to the system to optimize its performance. Contech reviewed and agreed with the proposed optimization adjustments. The implementation of proposed adjustments to the system was completed by Flippo Construction on February 5, 2019. AECOM and Contech then met on site to access the treatment system structures and inspect the fixed sampling points installed at each hotspot. Based on this inspection, Contech prepared a proposed performance testing and sampling approach, which was reviewed by AECOM and Pepco. The next step is for AECOM to collect samples of influent and effluent at each hot spot during a qualifying storm event to determine the pollutant removal efficiency of each treatment structure to complete the acceptance testing and establish the baseline for ongoing performance testing.

Pepco collected the first quarter 2019 stormwater sample from Outfall 013 during a qualifying storm event on March 1, 2019. The analytical results showed full compliance with the permit limits for all metals and total suspended solids. The sampling results are summarized in the table below:

Analyte	Units	Permit Daily Maximum Limit	Permit Monthly Average Limit	March 1, 2019 sampling results
Copper	mg/L	0.0134	0.00524	0.00515
Lead	mg/L	0.06458	0.0566	0.0032
Zinc	mg/L	0.117	0.073	0.0271
Cadmium	mg/L	0.00495	0.00208	<0.00025
Iron	mg/L	1	0.69	0.32
Total Suspended Solids	mg/L	100	30	30

1	Review As-built Drawings - Rationale: Required by DOE Stormwater Management Division as part of construction completion, also needed for system evaluation - Review, identify missing information and items needing clarification - Collect missing information - Evaluate potential impact of deviations - Identify and implement fixes if needed	All	AECOM/Filippo	AECOM completed a review of as-built drawings on 4/30/18. Filippo responded 5/31/18. AECOM completed the additional as-built survey on 5/24/18 to fill data gaps identified by AECOM. AECOM currently performing an as-built review and hydraulic evaluation, which was anticipated to be completed by 6/6/18. AECOM and Filippo have completed collection and review of initial (6/22/18) and additional survey data points (7/3/18). On 6/18/18, AECOM began working to finalize system hydraulic evaluation and corrective actions. AECOM is currently on schedule to deliver drawings and specifications for corrective actions to Pepco on 7/13/18.	Pepco SWTM project team (Pepco, AECOM, and Filippo) participated in a technical meeting on 6/13/18 to discuss the proposed Initial Corrective Actions (ICAs) for stormwater treatment. Based on this meeting, an agreed upon draft schedule was developed for data collection, treatment design, and construction/installation. AECOM delivered the Remedial Design (Rev 6) to Pepco on 7/20/18. The Remedial Design (Rev 6) included proposed modification to flow splitters and treatment units. Filippo began implementing the proposed modifications on 8/3/18 and completed work on 8/17/18. Pepco completed flushing of the drainage system to remove any construction related debris on 8/31/18. Following construction, AECOM received revised as-built drawings on 8/27/18. AECOM completed as-built review on 8/31/18, and noted no issues. AECOM uploaded the as-built data to the DOE SW Database on 9/4/18.	Task Completed	No update (12/20/18)	No update (01/17/19)	No update (02/25/19)
2	CCTV Inspection of Drainage System - Rationale: Consent Decree requirement; also needed for system performance evaluation - Includes new storm drain lines installed as part of treatment system, but not treatment system components or structures	Site-wide storm drain system	AECOM/Pepco	CCTV inspection completed; accumulated sediment and debris identified during inspection (9.5 tons) was removed as of 5/29/18.	Pepco is in the process of engaging a contractor to make system repairs.	System repair work expected to begin in October 2018.	Repair work is in progress and will be completed by 12/31/2018.	Priority repair/replacement work as identified by the CCTV inspection was completed on 12/26/2018. Remaining work to be completed in the first quarter 2019.	Remaining repair/replacement work to be completed in the first quarter 2019.
3	Test Functioning of the Check Valves - Rationale: To ensure check valves are functioning as designed and not impeding flow - Filippo inspected	Check valves at HS1 and HS4	Filippo	The need and use of check valves will be evaluated as part of Task 1	The check valves were determined to be not warranted. Filippo removed the check valves at FS-2 and FS-3 on 7/16/18 and 8/3/18, respectively.	Task completed	No update (12/20/18)	No update (01/17/19)	No update (02/25/19)

- **Rationale:** To inspect each treatment structure
- Document any conditions or deficiencies impeding treatment

On 9/21/18, AECOM completed an additional Dry Conditions inspection with CONTECH. CONTECH's observations at most structures identified that (a) Corrective actions by Filippo appear to have been done successfully; (b) Little to no observable flow (as expected), and (c) No irregularities observed.

No update
Task 11

No update
Task 11:

19). See

[illegible]

- components and difficulty of isolating influent and effluent flows for sampling
- Additional samples to be collected using new sampling points once corrective actions identified in Tasks 1-8 are implemented

	StormFilters	Pepco/ I- STORMWATER	Need for this task will be reevaluated based on the findings of Tasks 1-9	No update (7/6/18)	Tasks 1-8 have been completed. Pepco completed cleaning/flushing of the storm drain lines on 8/31/18	Task completed.	Pepco completed cleaning/flushing of the storm drain lines on 11/30/18	No update (01/17/19)	No update (02/25/19)
10	Flood Treatment Structures to Rinase Fines • Rationale: To rinse filters and underdrains of zeolite dust per CONTECH recommendation • Zeolite dust itself has no metals but could adsorb metals • Zeolite dust, if present in effluent, could result in higher effluent concentrations								
11	Evaluation of the Design to Optimize Operation of StormFilter Systems • Re-inspection of stormwater treatment units and components to confirm equipment type and configuration • Investigate water quality inflows to each hot spot • Initial routing calculations for each structure • Rerun the SWMM model to include the	All	CONTECH/ AECOM	NA	NA	NA	AECOM has completed rerunning the SWMM model for each hotspot based on additional data/information provided by CONTECH for their proprietary treatment units. Based on this more detailed and site-specific hydraulic model, AECOM has developed a set of proposed optimizations to improve stormwater flow splitter performance, and optimize treatment system function. The proposed optimizations are currently with CONTECH for review and determination of compliance with their proprietary treatment units. Based on this more detailed and site-specific modeling, AECOM and CONTECH	Contech agreed with the adjustments proposed by AECOM and proposed additional adjustments to improve flow management at SF 4. No additional optimizations are recommended by Contech at this time to achieve design treatment. Per the SWMM, AECOM prepared the following adjustments to optimize system performance: • HS1 (SF1) is receiving greater than 100% of the design storm first- flush for treatment. No further adjustments are proposed • HS2 (SF2) is currently receiving greater than 90% of design storm first-flush for	On 2/5/19 implementation of the design modifications was completed to optimize system performance as follows: • At HS1- there were no adjustments proposed or completed • At HS2- the weir walls at FS3 and FS4 were raised to optimize the volume of stormwater redirected for treatment • At HS3- the weir wall at FS5 was raised, the flow restrictor plates to JF3A & JF3B were removed, and MAW extensions were added to JF3A & JF3B to optimize the volume of stormwater redirected for treatment. • At HS4 - the weir wall at

- Jellyfish filter and StormFiller treatment structures
- Design modifications (if necessary)
- Check the hydraulic grade line (HGL) for water quantity flows.
- Review data and develop potential options to optimize performance at these treatment structures

will develop detailed recommendations to optimize stormwater flow and performance at these treatment structures for a range of storm events up to maximum system design.

optimization adjustments will be implemented based on final recommendations from AECOM and CONTECH.

treatment. Raising of weir walls at FS3 and FS4 is proposed to optimize the volume of stormwater that is being redirected for treatment.

FS6 was raised, hi-flo cartridges were added at JF4, and the overflow assembly invert at SF4 was raised to optimize the volume of stormwater redirected for treatment.

- HS3 (SF3A & SF3B) are currently receiving greater than 90% of a design storm first-flush for treatment. Raising the weir wall at FS5 removing flow restrictor plates to JF3A & JF3B, and adding MAW extensions to JF3A & JF3B are proposed to optimize the volume of stormwater that is being redirected for treatment.
- HS4 (SF4) is currently receiving greater than 80% of a design storm first-flush for treatment. Raising the weir wall at FS6 adding hi-flo cartridges at JF4, and raising the overflow assembly invert at SF4 is proposed to optimize the volume of stormwater that is being redirected for treatment.

Paragraph 68.a.(6) of the Consent Decree

Stormwater Management Training

The attached list includes the name of the employees working at Benning who received the Stormwater Management Training during the first quarter 2019.

[illegible]

Paragraph 68.a.(7) of the Consent Decree

Stormwater Pollution Prevention Plan

No update was made to the Plan during the first quarter 2019.

Paragraph 68.a.(8) of the Consent Decree

Change in Management Responsibilities

There was no change in management responsibilities during the first quarter 2019.

Paragraph 68.a.(9) of the Consent Decree

Status of Completion of Transformer Storage Shed

The construction of Transformer Storage Shed was completed by December 31, 2016 and the facility was placed in operation. The storage shed has been operating as designed for temporary storage of off-line and removed from service transformers and other electrical equipment while awaiting recycling or disposal.

Paragraph 68.a.(10) of the Consent Decree

Status of Stormwater Retention Project

As reported in the 2018 second quarter status report, Pepco determined that the Stormwater Retention Project described in Section VIII of the Consent Decree was not technically feasible and paid the stipulated penalty of \$500K to EPA in August 2018 for not implementing this project. As noted in the third quarter status report, Pepco began evaluating alternative options for treating stormwater discharges to Outfall 101, although not required under the terms of the consent decree or permit. As part of this effort, Pepco's technical consultant (Princeton Hydro) has been collecting and analyzing data on the solids and metals loading concentrations of individual inlets located within the Outfall 101 drainage area. The purpose of individual inlet sampling is to determine which inlet, or portion of the drainage area, contributes higher suspended solids and metals loading in stormwater discharges to Outfall 101. This will enable Pepco to target and ultimately better address pollutant loading within the Outfall 101 drainage area.

Pepco is required by the permit to collect quarterly samples of stormwater discharged via Outfall 101. As part of the sampling efforts recommended by Princeton Hydro, individual and composite samples were collected from four inlets (87, 88, 90, and 91) during qualifying storm events on August 21 and September 17, and most recently December 14, 2018. A summary of these sampling efforts was provided to EPA in the third and fourth quarter 2018 status reports.

Pepco collected another round of individual and composite samples during a qualifying storm event on April 19, 2019. The results of this sampling will be evaluated by Princeton Hydro to further identify the source of metal and suspended solids loading within the Outfall 101 drainage area. It is expected that this sampling data will further support Pepco's effort to identify feasible options for reducing metals and suspended solids in stormwater runoff discharged via Outfall 101.

Paragraph 68.a.(11) of the Consent Decree

Description of Non-Compliance

There was no non-compliance with the permit limits during the first quarter 2019. Pepco collected the first quarter compliance samples from Outfall 013 during a qualifying storm event on March 1, 2019. The analytical results showed full compliance with the permit limits for all metals and total suspended solids and are included with the status update for the stormwater treatment system (Paragraph 68.a.5)

