

Via Electronic and US Mail - 7011 1150 0001 6024 0137

January 30, 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 October - December 2018**

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 October - December 2018:

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

1/31/19

Date

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

Discharge Monitoring Reports

Copies of DMRs for October - December 2018 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 10/01/18 to 10/31/18
Status: NetDMR Validated

DMR Due Date: 11/28/18

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 Analysis	Type

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			Units	# 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 from the oil/water separator to monitoring point 003 in October 2018.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-11-20 10:20 (Time Zone:-05:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-11-20 10:21 (Time Zone:-05:00)

©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: 013 - External Outfall **Discharge:** 013-A - BNON COOLING WATER BLOWDOWN

Report Dates & Status

Monitoring Period: From 09/01/18 to 10/31/18 **DMR Due Date:** 11/28/18
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			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3				
50050	Flow, in conduit or thru treatment plant	Smpl.	=0.003	=0.0192	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 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: 2018-11-20 10:32 (Time Zone:-05:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-11-20 10:32 (Time Zone:-05:00)

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 11/01/18 to 11/30/18
Status: **NetDMR Validated**

DMR Due Date: 12/28/18

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

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH											
1 - Effluent Gross		Smpl.				=7.9		=8.3	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.				=4.2		=4.2	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.										
Season: 0		Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					B - Below Detection Limit/No Detection	B - Below Detection Limit/No Detection				
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.	=0.00397	=0.00397	03 - MGD		=0.00397	=0.00397	03 - MGD		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: 2018-12-17 10:06 (Time Zone:-05:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-12-17 10:07 (Time Zone:-05:00)

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Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services

Facility: PEPCO - BENNING

Permitted Feature: 003 - External Outfall

Report Dates & Status

Monitoring Period: From 12/01/18 to 12/31/18

Status: NetDMR Validated

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP, Operations

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

DMR Due Date: 01/28/19

Last Name: Sullivan

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		Units	Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2		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**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-01-16 10:54 (Time Zone:-05:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-01-16 10:54 (Time Zone:-05:00)

©2008 NetDMR

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services
Facility: PEPCO - BENNING

Major: ☒

Permittee Address: 701 Ninth Street, NW, Room 6219
 WASHINGTON, DC20019
Facility Location: 3300 BENNING ROAD, N.E.
 WASHINGTON, DC20019
Discharge: 013-A - BNON COOLING WATER BLOWDOWN

Permitted Feature: 013 - External Outfall

Report Dates & Status

Monitoring Period: From 11/01/18 to 12/31/18
Status: NetDMR Validated

DMR Due Date: 01/28/19

Considerations for Form Completion**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			# 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.	=0.003637	=0.02475	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: -											
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: -											
						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: 2019-01-10 09:26 (Time Zone:-05:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-01-10 09:27 (Time Zone:-05:00)

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services

Facility: PEPCO - BENNING

Permitted Feature: 013 - External Outfall

Report Dates & Status

Monitoring Period: From 10/01/18 to 12/31/18

Status: NetDMR Validated

Considerations for Form Completion

NO BLOWDOWN

Principal Executive Officer

First Name: William
Title: VP, Operations

Major: ☒

Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON, DC20019

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

Discharge: 013-Q - No Blowdown

DMR Due Date: 01/28/19

Last Name: Sullivan

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		Units	Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
		Value 1	Value 2		Value 1	Value 2	Value 3				
00400 pH											
1 - Effluent Gross	Smpl.				=7.48	=7.48		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.				=2.4	=2.4		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.				<5.3	<5.3		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.				<0.25	<0.25		28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0	Req.					<=2.08 MO AVG	<=4.95 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI										
01042 Copper, total [as Cu]											
1 - Effluent Gross	Smpl.				=2.6	=2.6		28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0	Req.					<=5.24 MO AVG	<=13.44 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI										
X 01045 Iron, total [as Fe]											
1 - Effluent Gross	Smpl.				=0.13	=0.13		19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0	Req.					<=.69 MO AVG	<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI										
01051 Lead, total [as Pb]											
1 - Effluent Gross	Smpl.				=1.1	=1.1		28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0	Req.					<=56.6 MO AVG	<=64.58 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI										
01092 Zinc, total [as Zn]											
1 - Effluent Gross	Smpl.				=18.3	=18.3		28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0	Req.					<=73.11 MO AVG	<=117.18 DAILY MX	28 - ug/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

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

Parameter		Monitoring Location	Field	Type	Description	Acknowledge
Code	Name					
01045	Iron, total [as Fe]	1 - Effluent Gross	Units	Soft	The selected units do not match the units specified by the permit for this parameter. (Error Code: 3)	☒

Comments

Iron Units - NPDES permit limits for Iron are 0.69 mg/l (monthly average) and 1 mg/l (daily maximum).

Attachments

Name	Type	Size
AttachmentsDecember2018.pdf	pdf	77317

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-01-10 10:48 (Time Zone:-05:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-01-10 10:51 (Time Zone:-05:00)

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	12/2/2018	13	0.21	120

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction for December 2 and 14, 2018 samplings at Outfalls 013 and 101 (Manhole K).

Burning Generating Station
Pollutant Load Fraction Reduction
Washington, DC

Outfall	Parameter	Sample Date	Concentration (mg/L) (a)	Average Flow (cfs) (b)	Load (mg/s)	Maximum Daily Load (mg/s) (c)	Maximum Daily Stormwater Discharge Concentration (mg/L) (d)	Baseline Concentration (mg/L)	Source of Baseline Concentration ^{1(a)}	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction from Baseline ^{2(a)}	Pollutant Concentration Reduction Compared with Baseline ^{2(b)}	Pollutant Load Reduction Compared with Baseline ^{2(c)}
0130	TSS	12/22/2018	2.4	0.40	27.18	100	100	42	(b) Highest TSS discharge concentration from DMR data for Oct-2018 TSS was not reported on DMRs prior to Jul-Sep 2008. Flow was measured in October 2010.	4.82	5732	98%	94%	100%
0130	Cadmium	12/22/2018	<0.000250	0.40	0.0 ^{1(a)}	0.00405	0.0045	0.000375	(b) Residuals potential for cadmium concentration for cadmium DMR data for Jul-Sep 2008.	7.48	0.18	100%	100%	100%
0130	Copper	12/22/2018	0.0028	0.40	0.03	0.01344	0.0134	0.064	(b) Highest copper discharge concentration from DMR data for Oct-2018 Copper DMR data for Jul-Sep 2008.	3.14	5.7	81%	86%	89%
0130	Iron	12/22/2018	0.13	0.40	1.47	100	NA	5.80	(b) Highest iron discharge concentration from DMR data for Oct-2018 Iron DMR data for Jul-Sep 2008.	0.148	24	87%	86%	84%
0130	Nickel	12/22/2018	0.0024	0.40	0.03	0.117 ^{1(a)}	0.117	0.056	(b) Baseline potential for nickel DMR data for Jul-Sep 2007.	0.148	0.23	86%	86%	89%
0130	Lead	12/22/2018	0.0011	0.40	0.01	0.0645	0.0645	0.023	(b) Highest lead discharge concentration from DMR data for Oct-2018 Lead DMR data for Jul-Sep 2008.	7.48	4.9	98%	95%	100%
0130	Zinc	12/22/2018	0.0183	0.40	0.2	0.1718	0.117	0.8	(b) Highest zinc discharge concentration from DMR data for Oct-2018 Zinc DMR data for Jul-Sep 2008.	5.15	131	84%	86%	100%
0130	PCB-1242	12/22/2018	<0.000480	0.40	0.0 ^{1(a)}	No Discharge	NA	0	(b) Highest PCB-1242 discharge concentration from DMR data for Oct-2018 PCB-1242 DMR data for Jul-Sep 2008.	NA ^{1(a)}	0 ^{1(a)}	0%	0% ^{1(a)}	0% ^{1(a)}
0130	PCB-1254	12/22/2018	<0.000480	0.40	0.0 ^{1(a)}	No Discharge	NA	0	(b) Highest PCB-1254 discharge concentration from DMR data for Oct-2018 PCB-1254 DMR data for Jul-Sep 2008.	NA ^{1(a)}	0 ^{1(a)}	0%	0% ^{1(a)}	0% ^{1(a)}
0130	PCB-1260	12/22/2018	<0.000480	0.40	0.0 ^{1(a)}	No Discharge	NA	0	(b) Highest PCB-1260 discharge concentration from DMR data for Oct-2018 PCB-1260 DMR data for Jul-Sep 2008.	NA ^{1(a)}	0 ^{1(a)}	0%	0% ^{1(a)}	0% ^{1(a)}
Marble K	TSS	12/14/2018	50	0.27	382	Monitor Only	NA	41	(b) Highest TSS discharge concentration from DMR data for Oct-2018 TSS DMR data for Jul-Sep 2008.	0.223	289	NA	-22%	-45%
Marble K	Cadmium	12/14/2018	0.000580	0.27	0	0.0045 ^{1(a)}	0.0075	0.00012	(b) Highest cadmium discharge concentration from DMR data for Oct-2018 Cadmium DMR data for Jul-Sep 2008.	0.223	0.0076	84%	76%	73%
Marble K	Copper	12/14/2018	0.0017	0.27	0.242	0.0134 ^{1(a)}	0.0134	0.063	(b) Highest copper discharge concentration from DMR data for Oct-2018 Copper DMR data for Jul-Sep 2008.	0.223	0.50	-137%	66%	59%
Marble K	Iron	12/14/2018	2.2	0.27	16.8	Monitor Only	NA	3.8	(b) Highest iron discharge concentration from DMR data for Oct-2018 Iron DMR data for Jul-Sep 2008.	0.223	24	-412%	70%	50%
Marble K	Nickel	12/14/2018	0.027	0.27	0.208	0.117 ^{1(a)}	0.117	0.09	(b) Highest nickel discharge concentration from DMR data for Oct-2018 Nickel DMR data for Jul-Sep 2008.	0.223	0.57	77%	71%	64%
Marble K	Lead	12/14/2018	0.038	0.27	0.291	0.0645 ^{1(a)}	0.0645	0.13	(b) Highest lead discharge concentration from DMR data for Oct-2018 Lead DMR data for Jul-Sep 2008.	0.223	0.82	41%	71%	65%
Marble K	Zinc	12/14/2018	0.085	0.27	0.78	0.117 ^{1(a)}	0.117	0.57	(b) Highest zinc discharge concentration from DMR data for Oct-2018 Zinc DMR data for Jul-Sep 2008.	0.223	3.0	15%	63%	76%
Marble K	PCB-1242	12/14/2018	<0.000480	0.27	0.0 ^{1(a)}	No Discharge	NA	0.0 ^{1(a)}	(b) Highest PCB-1242 discharge concentration from DMR data for Oct-2018 PCB-1242 DMR data for Jul-Sep 2008.	0.223	0 ^{1(a)}	NA	0% ^{1(a)}	0% ^{1(a)}
Marble K	PCB-1254	12/14/2018	<0.000480	0.27	0.0 ^{1(a)}	No Discharge	NA	0.0 ^{1(a)}	(b) Highest PCB-1254 discharge concentration from DMR data for Oct-2018 PCB-1254 DMR data for Jul-Sep 2008.	0.223	0 ^{1(a)}	NA	0% ^{1(a)}	0% ^{1(a)}
Marble K	PCB-1260	12/14/2018	<0.000480	0.27	0.0 ^{1(a)}	No Discharge	NA	0.0 ^{1(a)}	(b) Highest PCB-1260 discharge concentration from DMR data for Oct-2018 PCB-1260 DMR data for Jul-Sep 2008.	0.223	0 ^{1(a)}	NA	0% ^{1(a)}	0% ^{1(a)}

Sources:
(a) Marcellus, 2018. Fourth Quarter 2018 Sample Analytical Results. Marcellus Laboratories, Inc.
(b) USEPA, 2008a. Authorization to Discharge under the National Pollutant Discharge Elimination System Industrial Permit Number: D00000004. United States Environmental Protection Agency. Effective July 10, 2008.
(c) Maximum Daily Load based on the 2008 NPDES Permit.

Notes:
cfs - cubic feet per second
mg/L - milligrams per liter
mg/s - milligrams per second
NA - 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.
3) Not required by 2008 NPDES Permit for Burning Generating Station.
4) Data from the September 5, 2011 sampling event for Marble K was established as the baseline load because it was the first sample collected after Marble K was reinstalled. The interval was performed so that a representative sample could be collected from Marble K. Flow was estimated based on the steam intensity and catchment area.
5) No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Goals for Marble listed in Section VII.E of the 2008 NPDES Permit for Burning Generating Station.
6) No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Goals for Marble listed in Section VII.E of the 2008 NPDES Permit for Burning Generating Station.
7) Pollutant values indicate that the December 2018 concentrations are lower than the baseline concentrations.
8) There were no detections of PCB fractions. Therefore, a baseline flow was not established. However, given that the concentration of PCB fractions is zero, the load is also zero regardless of flow.
9) Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 0130 from 2006 to 2007. TSS was not reported on DMRs until 2008. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2008 to 2010 DMRs for Outfall 0130.

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services

Facility: PEPCO - BENNING

Permitted Feature: 101 - External Outfall

Report Dates & Status

Monitoring Period: From 10/01/18 to 12/31/18

Status: NetDMR Validated

Considerations for Form Completion

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

Principal Executive Officer

First Name: William
Title: VP, Operations

Major:

Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON, DC20019

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

Discharge: 101-Q - (no description)

DMR Due Date: 01/28/19

Last Name: Sullivan

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		Units	Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
		Value 1	Value 2		Value 1	Value 2	Value 3				
00400 pH	Smpl.				=7.38	=7.38		12 - SU	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross											
Season: 0	Req.				>=6 MINIMUM	<=8.5 MAXIMUM		12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -	NODI										
00530 Solids, total suspended	Smpl.				=50	=50		19 - mg/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross											
Season: 0	Req.				Req Mon MO AVG	Req Mon DAILY MX		19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI										
00556 Oil & Grease	Smpl.				<5.3	<5.3		19 - mg/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross											
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	Smpl.				=2.2	=2.2		19 - mg/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross											
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]	Smpl.				=0.269	=0.269		28 - ug/L	0	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										
01042 Copper, total [as Cu]	Smpl.				=31.7	=31.7		28 - ug/L	0	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										
01051 Lead, total [as Pb]	Smpl.				=38	=38		28 - ug/L	0	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										
01067 Nickel, total [as Ni]	Smpl.				=27	=27		28 - ug/L	0	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										
01092 Zinc, total [as Zn]	Smpl.				=99.5	=99.5		28 - ug/L	0	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										
39496 PCB-1242	Smpl.				=0	=0		28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross											
Season: 0	Req.										

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				
							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	0	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	0	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.					=0.174	=0.174	03 - MGD	0	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		01/5Y - 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 met in compliance with the permit condition. Therefore, no sampling was conducted.

Attachments

Name	Type	Size
attachmentsDecember142018.pdf	pdf	77774

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-01-16 10:39 (Time Zone:-05:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-01-16 10:39 (Time Zone:-05:00)

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)
101	12/14/2018	41	2.99	296

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction for December 2 and 14, 2018 samplings at Outfalls 013 and 101 (Manhole K).

Barring Generating Station
Pollutant Load Report Substation
Washington, DC

Outfall	Parameter	Sample Date	Concentration (mg/L)	Average Flow (cfs) ¹	Load (mg/s)	Maximum Daily Discharge (mg/s)	Maximum Daily Streamer Discharge (mg/s)	Baseline Concentration (mg/L)	Source of Baseline Concentration ¹⁰	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ¹¹	Pollutant Concentration Reduction Compared with Baseline Concentration ¹²	Pollutant Load Concentration Compared with Baseline Load ¹³
0130	TSS	12/2/2018	2.4	0.40	27.18	100	100	42	(a) Highest TSS discharge concentration from DMR data for Oct-Dec 2010. TSS was not reported on DMRs prior to Jul-Sep 2008. Flow was measured in October 2010.	4.82	5722	98%	94%	100%
0130	Cadmium	12/2/2018	<0.000250	0.40	0.01 ¹¹	0.00465	0.00465	0.00075	(a) Highest cadmium discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	7.49	0.16	100%	100%	100%
0130	Copper	12/2/2018	0.0026	0.40	0.03	0.01344	0.0134	0.004	(b) Highest copper discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	3.14	5.7	81%	98%	99%
0130	Iron	12/2/2018	0.13	0.40	1.47	1.00	NA	5.80	(c) Highest iron discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	0.148	24	87%	98%	94%
0130	Nickel	12/2/2018	0.0024	0.40	0.03	0.117 ¹¹	0.117	0.006	(a) Baseline nickel discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	0.148	0.23	95%	98%	88%
0130	Lead	12/2/2018	0.0011	0.40	0.01	0.0648	0.0645	0.023	(b) Highest lead discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	7.49	4.9	98%	97%	100%
0130	Zinc	12/2/2018	0.0183	0.40	0.2	0.1718	0.117	0.9	(c) Highest zinc discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	5.15	131	84%	98%	100%
0130	PCB-1342	12/2/2018	<0.000469	0.40	0.07 ¹¹	NA	NA	0	(a) Baseline PCB-1342 discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	NA ¹⁴	0.23	0%	0%	0%
0130	PCB-1254	12/2/2018	<0.000469	0.40	0.07 ¹¹	NA	NA	0	(b) Highest PCB-1254 discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	NA ¹⁴	0.23	0%	0%	0%
0130	PCB-1260	12/2/2018	<0.000469	0.40	0.07 ¹¹	NA	NA	0	(c) Highest PCB-1260 discharge concentration from DMR data for Jul-Sep 2008. Flow was measured in October 2010.	NA ¹⁴	0.23	0%	0%	0%
Marble K	TSS	12/14/2018	50	0.27	382	Marble Only	NA	41	(a) Highest TSS discharge concentration from DMR data for Mar-Apr 2005.	0.223	299	NA	-22%	-48%
Marble K	Cadmium	12/14/2018	0.000068	0.27	0	0.0045 ¹¹	0.0075	0.0012	(b) Highest cadmium discharge concentration from DMR data for Mar-Apr 2005.	0.223	0.0076	94%	78%	73%
Marble K	Copper	12/14/2018	0.0317	0.27	0.242	0.0134 ¹¹	0.0134	0.003	(c) Highest copper discharge concentration from DMR data for Mar-Apr 2005.	0.223	0.39	-137%	89%	59%
Marble K	Iron	12/14/2018	2.2	0.27	16.8	Marble Only	NA	3.6	(d) Highest iron discharge concentration from DMR data for Mar-Apr 2005.	0.223	24	47%	47%	30%
Marble K	Nickel	12/14/2018	0.027	0.27	0.206	0.117 ¹¹	0.117	0.09	(e) Highest nickel discharge concentration from DMR data for Mar-Apr 2005.	0.223	0.57	77%	70%	64%
Marble K	Lead	12/14/2018	0.038	0.27	0.291	0.0645 ¹¹	0.0645	0.13	(f) Highest lead discharge concentration from DMR data for Mar-Apr 2005.	0.223	0.82	41%	71%	65%
Marble K	Zinc	12/14/2018	0.0060	0.27	0.78	0.117 ¹¹	0.117	0.57	(g) Highest zinc discharge concentration from DMR data for Mar-Apr 2005.	0.223	3.6	15%	83%	79%
Marble K	PCB-1342	12/14/2018	<0.000469	0.27	0.07 ¹¹	NA	NA	0.07 ¹¹	(a) Baseline PCB-1342 discharge concentration from DMR data for Mar-Apr 2005.	0.223	0.223	NA	0%	0%
Marble K	PCB-1254	12/14/2018	<0.000469	0.27	0.07 ¹¹	NA	NA	0.07 ¹¹	(b) Baseline PCB-1254 discharge concentration from DMR data for Mar-Apr 2005.	0.223	0.223	NA	0%	0%
Marble K	PCB-1260	12/14/2018	<0.000469	0.27	0.07 ¹¹	NA	NA	0.07 ¹¹	(c) Baseline PCB-1260 discharge concentration from DMR data for Mar-Apr 2005.	0.223	0.223	NA	0%	0%

Prepared by JAF 1/7/2019
Checked by ABC 1/8/2019

Source: (a) Fourth Quarter 2018 Sample Analysis Results, Marble Laboratories, Inc.
(b) USEPA, 2006, Authorization to Discharge Under the National Pollutant Discharge Elimination System (NPDES) Permit Number: DC0000004, United States Environmental Protection Agency, Effective July 19, 2006.
(c) Maximum Daily Load listed in the 2005 NPDES Permit.
Notes: cfs - cubic feet per second mg/L - milligrams per liter mg/s - milligrams per second lbs - cubic feet per second NA - 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.
(3) Not required by 2008 NPDES Permit for Barring Generating Station.
(4) Data from the September 5, 2011 sampling event for Marble K was established as the baseline load because it was the first sample collected after Marble K was restricted. The report was performed so that a representative sample could be collected from Marble K. Flow was estimated based on the storm intensity and catchment area.
(5) The maximum daily flow is listed. Values in the Maximum Daily Streamer Discharge Concentration Goals for Marble listed in Section VII.E of the 2008 NPDES Permit for Barring Generating Station.
(6) The maximum daily flow is listed. Values in the Maximum Daily Streamer Discharge Concentration Goals for Marble listed in Section VII.E of the 2008 NPDES Permit for Barring Generating Station.
(7) Pollutant values indicate that the December 2018 concentrations are lower than the maximum daily limit for the pollutants.
(8) Pollutant values indicate that the December 2018 concentrations are lower than the baseline concentrations.
(9) There were no detections of PCB Andechs. Therefore, a baseline flow was not established. However, given that the concentration of PCB Andechs is zero, the load is also zero regardless of flow.
(10) Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 0130 from 2005 to 2007. TSS was not reported on DMRs until 2008. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2008 to 2010 DMRs for Outfall 0130.

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 10/01/18 to 12/31/18 **DMR Due Date:** 01/31/19

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	of	Analysis	Type
									Ex.		

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.				=7.6		=7.6	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.					=2	=2	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.					<5.3	<5.3	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.	=0.002997	=0.02475	03 - MGD		=0.002997	=0.02475	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**

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Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services
Facility: PEPCO - BENNING
Permitted Feature: 201 - External Outfall

Report Dates & Status

Monitoring Period: From 10/01/18 to 12/31/18
Status: NetDMR Validated

Considerations for Form Completion**Principal Executive Officer**

First Name: William
Title: VP, Operations

Major: ☒

Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 201-B - HYDROSTATIC TESTING TANKS

DMR Due Date: 01/31/19

Last Name: Sullivan
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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Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services
Facility: PEPCO - BENNING

Permitted Feature: 202 - External Outfall

Report Dates & Status

Monitoring Period: From 10/01/18 to 12/31/18
Status: NetDMR Validated

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name: William
Title: VP, Operations

Major: ☒

Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019

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

Discharge: 202-A - COOLING TOWER BLOWDOWN

DMR Due Date: 01/31/19

Last Name: Sullivan

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		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				
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			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis Type
	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**

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Report Last Signed By

User: FARIBA12
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 Date/Time: 2019-01-10 09:52 (Time Zone:-05:00)

Permit**Permit ID:** DC0000094**Permittee:** PEPCO Environment Management Services**Facility:** PEPCO - BENNING**Permitted Feature:** 202 - External Outfall**Report Dates & Status****Monitoring Period:** From 10/01/18 to 12/31/18**Status:** NetDMR Validated**Considerations for Form Completion**

COOLING TOWER UNITS 15 & 16

Principal Executive Officer**First Name:** William**Title:** VP, Operations**Major:** **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019**Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019**Discharge:** 202-B - COOLING TOWER BASIN WASH WATER**DMR Due Date:** 01/31/19**Last Name:** Sullivan**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

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E-Mail: fmahvi@pepco.com
Date/Time: 2019-01-10 09:54 (Time Zone:-05:00)

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Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services

Facility: PEPCO - BENNING

Permitted Feature: 203 - External Outfall

Report Dates & Status

Monitoring Period: From 10/01/18 to 12/31/18

Status: NetDMR Validated

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name: William
Title: VP, Operations

Major: ☒

Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019

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

Discharge: 203-A - COOLING TOWER BLOW DOWN

DMR Due Date: 01/31/19

Last Name: Sullivan
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			Units	# 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**

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User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-01-10 09:57 (Time Zone:-05:00)

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 10/01/18 to 12/31/18**DMR Due Date:** 01/31/19**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										
	1 - Effluent Gross	Smpl.									
	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										
	1 - Effluent Gross	Smpl.									
	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										
	1 - Effluent Gross	Smpl.									
	Season: 0	Req.						<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
	NODI: -	NODI						C - No Discharge			
39504	PCB-1254										
	1 - Effluent Gross	Smpl.									
	Season: 0	Req.						<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
	NODI: -	NODI						C - No Discharge			
39508	PCB-1260										
	1 - Effluent Gross	Smpl.									
	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										
	1 - Effluent Gross	Smpl.									
	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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E-Mail: fmahvi@pepco.com
Date/Time: 2019-01-10 09:59 (Time Zone:-05:00)

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

Annual Inspection of the Drainage System

An internal inspection of the facility's drainage system, using closed-circuit television (CCTV), was conducted between February 26 and April 18, 2018 by an AECOM subcontractor.

As reported in the second quarter 2018 status report, AECOM's evaluation of the CCTV inspection data indicated that the majority of storm drain lines that discharge to Outfall 013 are in relatively good condition. However, AECOM recommended corrective actions for certain conditions that were classified as significant or moderate, including several areas where repair or replacement of portions of the storm drain lines and/or inlets was warranted.

Pepco selected Flippo Construction to perform the storm drain repair work. The work was initially scheduled to start in late October; however, the delivery of equipment took longer than expected. Following the receipt of the equipment, Flippo began work on December 3, 2018. A summary of the work completed to date is provided below, and the locations are identified as the red triangles in the attached figure.

- a) The existing 15-inch storm drain lateral line from Manhole (MH) 38A to Inlet (I)39 was replaced with a new 15-inch HDPE (high density polyethylene) pipe.
- b) The existing 12-inch storm drain lateral from MH 51C to Discharge 407 was replaced with a 12-inch HDPE pipe.
- c) The existing 24-inch header located in the front of Building 88 loading dock, between the existing MH77 and newly installed MH76A, was abandoned in place by filling it with inert materials. The existing inlet structures I75, I76, and I77 were replaced with new inlets. A new 15-inch HDPE pipe was installed between new inlets I77, I76, and I75. A new 18-inch HDPE pipe was installed to connect I75 to new MH76A. As a result of this modification, the roof drains from Building 88 were re-configured. Two of the roof drains on the east side of the building were connected to a new 6-inch PVC header that terminates in MH77. MH77 was then connected to I77 with a new 8-inch PVC pipe. The remaining nine roof drains were connected to a new 12-inch PVC header, which terminates in MH76A.
- d) I-30 was repaired by sealing the void in the incoming lateral line from the Fire Pump House.
- e) The existing 12-inch lateral line from I07A to MH-4 was replaced with a new 12-inch HDPE pipe.

The remaining repair/replacement work (identified by blue triangles on the attached figure) is scheduled to start in early February 2019. The progress on this effort will be provided in the next quarterly report.

LEGEND

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

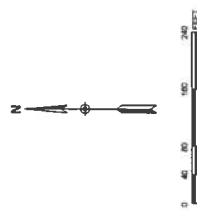
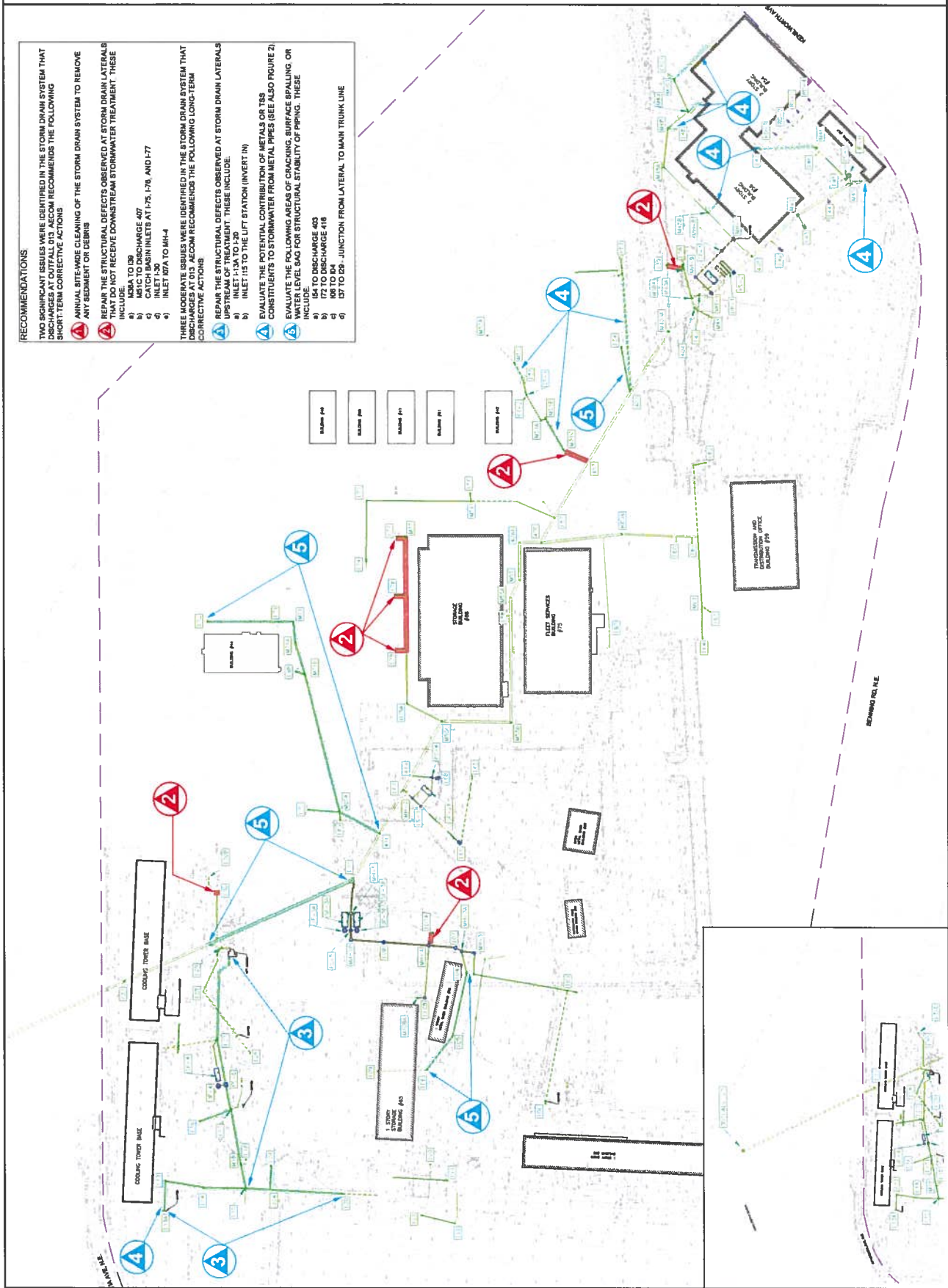


FIGURE TITLE

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 SITEWIDE CLEANING OF THE STORM DRAIN SYSTEM TO REMOVE ANY SEDIMENT OR DEBRIS
 - 2) REPAIR THE STRUCTURAL DEFECTS OBSERVED AT STORM DRAIN LATERALS DISCHARGES AT OUTFALL 013. AECOM RECOMMENDS THE FOLLOWING LONG-TERM CORRECTIVE ACTIONS:
 - a) MSHA TO DISB
 - b) MSHA TO DISCHARGE 407
 - c) MSHA TO DISCHARGE 408
 - d) MSHA TO DISCHARGE 409
 - e) MSHA TO DISCHARGE 410
 - f) MSHA TO DISCHARGE 411
 - g) MSHA TO DISCHARGE 412
 - h) MSHA TO DISCHARGE 413
 - i) MSHA TO DISCHARGE 414
 - j) MSHA TO DISCHARGE 415
 - k) MSHA TO DISCHARGE 416
 - l) MSHA TO DISCHARGE 417
 - m) MSHA TO DISCHARGE 418
 - n) MSHA TO DISCHARGE 419
 - o) MSHA TO DISCHARGE 420
 - p) MSHA TO DISCHARGE 421
 - q) MSHA TO DISCHARGE 422
 - r) MSHA TO DISCHARGE 423
 - s) MSHA TO DISCHARGE 424
 - t) MSHA TO DISCHARGE 425
 - u) MSHA TO DISCHARGE 426
 - v) MSHA TO DISCHARGE 427
 - w) MSHA TO DISCHARGE 428
 - x) MSHA TO DISCHARGE 429
 - y) MSHA TO DISCHARGE 430
 - z) MSHA TO DISCHARGE 431
 - aa) MSHA TO DISCHARGE 432
 - ab) MSHA TO DISCHARGE 433
 - ac) MSHA TO DISCHARGE 434
 - ad) MSHA TO DISCHARGE 435
 - ae) MSHA TO DISCHARGE 436
 - af) MSHA TO DISCHARGE 437
 - ag) MSHA TO DISCHARGE 438
 - ah) MSHA TO DISCHARGE 439
 - ai) MSHA TO DISCHARGE 440
 - aj) MSHA TO DISCHARGE 441
 - ak) MSHA TO DISCHARGE 442
 - al) MSHA TO DISCHARGE 443
 - am) MSHA TO DISCHARGE 444
 - an) MSHA TO DISCHARGE 445
 - ao) MSHA TO DISCHARGE 446
 - ap) MSHA TO DISCHARGE 447
 - aq) MSHA TO DISCHARGE 448
 - ar) MSHA TO DISCHARGE 449
 - as) MSHA TO DISCHARGE 450
 - at) MSHA TO DISCHARGE 451
 - au) MSHA TO DISCHARGE 452
 - av) MSHA TO DISCHARGE 453
 - aw) MSHA TO DISCHARGE 454
 - ax) MSHA TO DISCHARGE 455
 - ay) MSHA TO DISCHARGE 456
 - az) MSHA TO DISCHARGE 457
 - ba) MSHA TO DISCHARGE 458
 - bb) MSHA TO DISCHARGE 459
 - bc) MSHA TO DISCHARGE 460
 - bd) MSHA TO DISCHARGE 461
 - be) MSHA TO DISCHARGE 462
 - bf) MSHA TO DISCHARGE 463
 - bg) MSHA TO DISCHARGE 464
 - bh) MSHA TO DISCHARGE 465
 - bi) MSHA TO DISCHARGE 466
 - bj) MSHA TO DISCHARGE 467
 - bk) MSHA TO DISCHARGE 468
 - bl) MSHA TO DISCHARGE 469
 - bm) MSHA TO DISCHARGE 470
 - bn) MSHA TO DISCHARGE 471
 - bo) MSHA TO DISCHARGE 472
 - bp) MSHA TO DISCHARGE 473
 - bq) MSHA TO DISCHARGE 474
 - br) MSHA TO DISCHARGE 475
 - bs) MSHA TO DISCHARGE 476
 - bt) MSHA TO DISCHARGE 477
 - bu) MSHA TO DISCHARGE 478
 - bv) MSHA TO DISCHARGE 479
 - bw) MSHA TO DISCHARGE 480
 - bx) MSHA TO DISCHARGE 481
 - by) MSHA TO DISCHARGE 482
 - bz) MSHA TO DISCHARGE 483
 - ca) MSHA TO DISCHARGE 484
 - cb) MSHA TO DISCHARGE 485
 - cc) MSHA TO DISCHARGE 486
 - cd) MSHA TO DISCHARGE 487
 - ce) MSHA TO DISCHARGE 488
 - cf) MSHA TO DISCHARGE 489
 - cg) MSHA TO DISCHARGE 490
 - ch) MSHA TO DISCHARGE 491
 - ci) MSHA TO DISCHARGE 492
 - cj) MSHA TO DISCHARGE 493
 - ck) MSHA TO DISCHARGE 494
 - cl) MSHA TO DISCHARGE 495
 - cm) MSHA TO DISCHARGE 496
 - cn) MSHA TO DISCHARGE 497
 - co) MSHA TO DISCHARGE 498
 - cp) MSHA TO DISCHARGE 499
 - cq) MSHA TO DISCHARGE 500



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

Storm Drain Inlets Inspection Logs

The inspection logs for October - December 2018 are attached.

Weekly Inspection of Drain Guards 2018

Weekly Inspection of Drain Guards 2018										
Description	Dimensions	Control Type	Inspected Date	Inspected by	Comments	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by
1	24"x36"	Drain guard plus	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
2	27"x27"	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
3	27"x27"	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
4	24"x36"	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
5	24"x36"	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
6	24"x36"	Drain guard plus	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
7	36"x60"	Drain guard plus	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
8	18" Round	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
9	24" Round	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
10	18" Round	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
11	24" Round	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
12	24" Round	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
13	42" Round	Heavy metal witch hat	10/4/2018	CV	Found OK	10/11/2018	CV	NEED CLEANING	10/29/2018	CV
14	70"x90"	Drain guard plus	10/4/2018	CV	Found OK	10/11/2018	CV	Found OK	10/29/2018	CV
15	36"x60"	Heavy metal witch hat	10/4/2018	CV	Found OK	10/11/2018	CV	Found OK	10/29/2018	CV
16	24" Round	Heavy metal witch hat	10/4/2018	CV	Found OK	10/11/2018	CV	Found OK	10/29/2018	CV
17	45"x45"	Heavy metal witch hat	10/5/2018	CV	Found OK	10/12/2018	CV	Found OK	10/29/2018	CV
18	31"x31"	Heavy metal witch hat	10/4/2018	CV	Found OK	10/11/2018	CV	Found OK	10/29/2018	CV
19	31"x31"	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	Found OK	10/29/2018	CV
20	27"x27"	Heavy metal witch hat	10/1/2018	CV	Found OK	10/8/2018	CV	NEED CLEANING	10/29/2018	CV
21	20" Round	Heavy metal witch hat	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
22	18"x25"	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	NEED CLEANING	10/29/2018	CV
23	30" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
24	30" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	NEED CLEANING	10/29/2018	CV
25	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
26	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	NEED CLEANING	10/29/2018	CV
27	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
28	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
29	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
30	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
31	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
32	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
33	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
34	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
35	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
36	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
37	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
38	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
39	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
40	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
41	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
42	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
43	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
44	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
45	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
46	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
47	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
48	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
49	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
50	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
51	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
52	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
53	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
54	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
55	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
56	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
57	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
58	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
59	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
60	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
61	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
62	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
63	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
64	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
65	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
66	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
67	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
68	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
69	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
70	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
71	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
72	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
73	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
74	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
75	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
76	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
77	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
78	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
79	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
80	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
81	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
82	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
83	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
84	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
85	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
86	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
87	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
88	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
89	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
90	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
91	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
92	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
93	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
94	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
95	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
96	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
97	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
98	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
99	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
100	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
101	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
102	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
103	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
104	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
105	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
106	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
107	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
108	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
109	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV
110	24" Round	Drain guard plus with sock	10/3/2018	CV	Found OK	10/17/2018	CV	Found OK	10/29/2018	CV

KENNETH GURLEY

Weekly Inspection of Drain Guards 2018											
Drain Number	Location	Control Type	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by	Comments
1	24"x30"	Drain guard plus	11/13/2018	CV	OK	11/19/2018	CV	OK	11/26/2018	CV	OK
2	27"x27"	Heavy metal switch hat	11/13/2018	CV	NEED CLEANING	11/19/2018	CV	OK	11/26/2018	CV	NEED CLEANING
3	27"x27"	Heavy metal switch hat	11/13/2018	CV	OK	11/19/2018	CV	OK	11/26/2018	CV	OK
4	24"x24"	Heavy metal switch hat	11/13/2018	CV	OK	11/19/2018	CV	OK	11/26/2018	CV	NEED CLEANING
5	24"x24"	Heavy metal switch hat	11/13/2018	CV	OK	11/19/2018	CV	OK	11/26/2018	CV	OK
6	24"x24"	Drain guard plus	11/13/2018	CV	NEED CLEANING	11/19/2018	CV	OK	11/26/2018	CV	OK
7	30"x30"	Drain guard plus	11/13/2018	CV	NEED CLEANING	11/19/2018	CV	OK	11/26/2018	CV	NEED CLEANING
8	24"x24"	Heavy metal switch hat	11/13/2018	CV	OK	11/19/2018	CV	NEED CLEANING	11/26/2018	CV	OK
9	24" Round	Heavy metal sock	11/13/2018	CV	OK	11/19/2018	CV	OK	11/26/2018	CV	OK
10	18" Round	Heavy metal switch hat / sock	11/13/2018	CV	NEED CLEANING	11/19/2018	CV	OK	11/26/2018	CV	OK
11	24" Round	Heavy metal switch hat / sock	11/13/2018	CV	OK	11/19/2018	CV	NEED CLEANING	11/26/2018	CV	NEED CLEANING
12	24" Round	Heavy metal sock	11/13/2018	CV	OK	11/19/2018	CV	OK	11/26/2018	CV	OK
13	42"x27"	Heavy metal sock	11/18/2018	CV	NEED CLEANING	11/15/2018	CV	OK	11/26/2018	CV	OK
14	70"x90"	Drain guard plus	11/18/2018	CV	NEED CLEANING	11/15/2018	CV	OK	11/26/2018	CV	OK
15	36"x40"	Heavy metal switch/sock	11/18/2018	CV	OK	11/15/2018	CV	OK	11/26/2018	CV	NEED CLEANING
16	24" Round	Heavy metal sock	11/19/2018	CV	OK	11/16/2018	CV	OK	11/30/2018	CV	OK
17	45"x45"	Heavy metal sock	11/19/2018	CV	OK	11/16/2018	CV	NEED CLEANING	11/30/2018	CV	NEED CLEANING
18	31"x31"	Heavy metal sock	11/19/2018	CV	OK	11/15/2018	CV	OK	11/29/2018	CV	OK
19	31"x31"	Heavy metal with sock	11/13/2018	CV	OK	11/19/2018	CV	NEED CLEANING	11/26/2018	CV	OK
20	27"x45"	Heavy metal with sock	11/17/2018	CV	NEED CLEANING	11/14/2018	CV	OK	11/28/2018	CV	OK
21	20" Round	Heavy metal with sock	11/17/2018	CV	OK	11/14/2018	CV	OK	11/28/2018	CV	NEED CLEANING
24	18"x25"	Drain guard plus with sock	11/17/2018	CV	OK	11/14/2018	CV	NEED CLEANING	11/28/2018	CV	OK
25	30" Round	Drain guard plus with sock	11/19/2018	CV	OK	11/19/2018	CV	OK	11/30/2018	CV	OK
28	30" Round	Drain guard plus with sock	11/19/2018	CV	NEED CLEANING	11/18/2018	CV	OK	11/30/2018	CV	NEED CLEANING
29	24" Round	Drain guard plus with sock	11/19/2018	CV	OK	11/16/2018	CV	NEED CLEANING	11/30/2018	CV	OK
30	24" Round	Drain guard plus with sock	11/19/2018	CV	OK	11/16/2018	CV	OK	11/30/2018	CV	NEED CLEANING
33	34" Round	Heavy metal with sock	11/19/2018	CV	NEED CLEANING	11/16/2018	CV	OK	11/30/2018	CV	OK
37	27"x27"	Heavy metal with sock	11/13/2018	CV	NEED CLEANING	11/19/2018	CV	OK	11/26/2018	CV	OK
38	117" Long	Curb guard plus	11/13/2018	CV	OK	11/20/2018	CV	OK	11/28/2018	CV	OK
39	137" Long	Curb guard plus	11/13/2018	CV	NEED CLEANING	11/20/2018	CV	OK	11/27/2018	CV	NEED CLEANING
40	238" Long	Curb guard plus	11/13/2018	CV	OK	11/20/2018	CV	OK	11/27/2018	CV	OK
42	27"x27"	Heavy metal with sock	11/13/2018	CV	NEED CLEANING	11/20/2018	CV	OK	11/27/2018	CV	NEED CLEANING
43	27"x27"	Heavy metal with sock	11/13/2018	CV	OK	11/20/2018	CV	OK	11/27/2018	CV	OK
44	27"x27"	Heavy metal with sock	11/13/2018	CV	OK	11/20/2018	CV	NEED CLEANING	11/27/2018	CV	OK
45	238" Long	Heavy metal with sock	11/13/2018	CV	NEED CLEANING						

[illegible]

Weekly Inspection of Drain Guards 2018

Description										
Drain Number	Dimensions	Control Type	Inspection Date	Inspected By	Comments	Inspection Date	Inspected By	Comments	Inspection Date	Inspected By
1	24" x 36"	Drain guard plus	12/3/2018	CV	NEED CLEANING	12/17/2018	CV	NEED CLEANING	12/31/2018	CV
2	27" x 27"	Heavy metal witch hat	12/3/2018	CV	OK	12/17/2018	CV	OK	12/31/2018	CV
3	27" x 27"	Heavy metal witch hat	12/3/2018	CV	OK	12/17/2018	CV	NEED CLEANING	12/31/2018	CV
4	24" x 24"	Heavy metal witch hat	12/3/2018	CV	OK	12/17/2018	CV	OK	12/31/2018	CV
5	24" x 24"	Heavy metal witch hat	12/3/2018	CV	NEED CLEANING	12/17/2018	CV	NEED CLEANING	12/31/2018	CV
6	24" x 24"	Drain guard plus	12/3/2018	CV	NEED CLEANING	12/17/2018	CV	OK	12/31/2018	CV
7	36" x 63"	Drain guard plus	12/3/2018	CV	OK	12/17/2018	CV	OK	12/31/2018	CV
8	26" Round	Heavy metal witch hat	12/3/2018	CV	OK	12/17/2018	CV	NEED CLEANING	12/31/2018	CV
9	24" Round	heavy metal sock	12/3/2018	CV	OK	12/17/2018	CV	OK	12/31/2018	CV
10	18" Round	heavy metal witch hat/sock	12/3/2018	CV	OK	12/17/2018	CV	OK	12/31/2018	CV
11	24" Round	heavy metal witch hat/sock	12/3/2018	CV	OK	12/17/2018	CV	NEED CLEANING	12/31/2018	CV
12	24" Round	heavy metal sock	12/3/2018	CV	NEED CLEANING	12/17/2018	CV	OK	12/31/2018	CV
13	42" Round	heavy metal sock	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
14	70" x 90"	Drain guard plus	12/13/2018	CV	OK	12/20/2018	CV	NEED CLEANING	12/27/2018	CV
15	36" x 40"	heavy metal witch/sock	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
16	24" Round	heavy metal sock	12/14/2018	CV	OK	12/21/2018	CV	OK	12/28/2018	CV
17	45" x 45"	heavy metal sock	12/14/2018	CV	NEED CLEANING	12/21/2018	CV	NEED CLEANING	12/28/2018	CV
18	31" x 31"	heavy metal sock	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
19	31" x 31"	Heavy metal with sock	12/13/2018	CV	OK	12/19/2018	CV	OK	12/31/2018	CV
20	22" x 49"	Heavy metal with sock	12/14/2018	CV	OK	12/19/2018	CV	NEED CLEANING	12/26/2018	CV
21	20" Round	Heavy metal with sock	12/12/2018	CV	OK	12/19/2018	CV	OK	12/26/2018	CV
24	18" x 25"	Drain guard plus with sock	12/12/2018	CV	OK	12/19/2018	CV	OK	12/26/2018	CV
25	30" Round	Drain guard plus with sock	12/14/2018	CV	NEED CLEANING	12/21/2018	CV	NEED CLEANING	12/28/2018	CV
28	30" Round	Drain guard plus with sock	12/14/2018	CV	OK	12/21/2018	CV	OK	12/28/2018	CV
29	24" Round	Drain guard plus with sock	12/14/2018	CV	OK	12/21/2018	CV	OK	12/28/2018	CV
30	24" Round	Drain guard plus with sock	12/3/2018	CV	OK	12/17/2018	CV	OK	12/31/2018	CV
33	24" Round	Heavy metal with sock	12/14/2018	CV	OK	12/21/2018	CV	NEED CLEANING	12/28/2018	CV
37	27" x 27"	Heavy metal with sock	12/3/2018	CV	OK	12/17/2018	CV	NEED CLEANING	12/31/2018	CV
38	117" Long	Curb guard plus	12/4/2018	CV	OK	12/11/2018	CV	OK	12/18/2018	CV
39	117" Long	Curb guard plus	12/4/2018	CV	NEED CLEANING	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
40	233" Long	Curb guard plus	12/4/2018	CV	OK	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
41	17" x 27"	Heavy metal with sock	12/4/2018	CV	OK	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
43	27" x 27"	Heavy metal with sock	12/4/2018	CV	NEED CLEANING	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
44	17" x 27"	Heavy metal with sock	12/4/2018	CV	NEED CLEANING	12/11/2018	CV	OK	12/18/2018	CV
45	233" Long	Heavy metal with sock	12/4/2018	CV	OK	12/11/2018	CV	OK	12/18/2018	CV
46	27" x 27"	Heavy metal with sock	12/4/2018	CV	OK	12/11/2018	CV	OK	12/18/2018	CV
47	27" x 27"	Heavy metal with sock	12/4/2018	CV	NEED CLEANING	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
48	24" x 24"	Heavy metal with sock	12/4/2018	CV	OK	12/11/2018	CV	OK	12/18/2018	CV
49	145" x 12"	sock	12/4/2018	CV	OK	12/11/2018	CV	OK	12/18/2018	CV
50	29" x 32"	No longer inspected. Inlet is not connected to facility's storm drain system. It is connected to city storm sewer on Benning Road								
51	65" x 49"	Heavy metal witch hat.	12/12/2018	CV	NEED CLEANING	12/19/2018	CV	NEED CLEANING	12/26/2018	CV
52	24" Round	Heavy metal witch hat	12/12/2018	CV	OK	12/19/2018	CV	OK	12/26/2018	CV
53	145" x 12"	Heavy metal witch hat	12/12/2018	CV	OK	12/19/2018	CV	NEED CLEANING	12/26/2018	CV
54	117" Long	Curb guard plus	12/12/2018	CV	OK	12/19/2018	CV	OK	12/26/2018	CV
55	117" Long	Not inspected. This is not an inlet, but a manhole to access the storm drain system, therefore, no control is required.								
56	35" x 35"	Heavy metal with sock	12/12/2018	CV	OK	12/19/2018	CV	NEED CLEANING	12/26/2018	CV
57	24" Round	Heavy metal witch hat	12/12/2018	CV	OK	12/19/2018	CV	OK	12/26/2018	CV
58	35" x 35"	Heavy metal witch hat	12/12/2018	CV	OK	12/19/2018	CV	NEED CLEANING	12/26/2018	CV
60	59" Long	Curb guard plus	12/12/2018	CV	NEED CLEANING	12/19/2018	CV	OK	12/26/2018	CV
61	117" Long	Curb guard plus	12/12/2018	CV	NEED CLEANING	12/19/2018	CV	NEED CLEANING	12/26/2018	CV
62	117" Long	Curb guard plus	12/12/2018	CV	NEED CLEANING	12/19/2018	CV	OK	12/26/2018	CV
63	117" Long	Curb guard plus	12/12/2018	CV	NEED CLEANING	12/19/2018	CV	OK	12/26/2018	CV
64	117" Long	Curb guard plus	12/12/2018	CV	NEED CLEANING	12/19/2018	CV	OK	12/26/2018	CV
65	24" x 27"	Heavy metal witch hat	12/13/2018	CV	NEED CLEANING	12/20/2018	CV	OK	12/27/2018	CV
66	50" x 45"	Heavy metal witch hat	12/13/2018	CV	NEED CLEANING	12/20/2018	CV	OK	12/27/2018	CV
67	24" Round	Heavy metal witch hat	12/13/2018	CV	OK	12/20/2018	CV	NEED CLEANING	12/27/2018	CV
68	66" Long	Curb guard plus	12/13/2018	CV	NEED CLEANING	12/20/2018	CV	OK	12/27/2018	CV
69	70" x 37"	Heavy metal with sock	12/13/2018	CV	OK	12/20/2018	CV	NEED CLEANING	12/27/2018	CV
70	70" x 37"	Curb guard plus	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
71	70" x 37"	Curb guard plus	12/13/2018	CV	NEED CLEANING	12/20/2018	CV	NEED CLEANING	12/27/2018	CV
72	24" Round	Curb guard plus	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
73	32" x 32"	Heavy metal witch hat	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
74	32" x 32"	Heavy metal witch hat	12/13/2018	CV	OK	12/20/2018	CV	NEED CLEANING	12/27/2018	CV
75	24" Round	Heavy metal witch hat	12/13/2018	CV	NEED CLEANING	12/20/2018	CV	OK	12/27/2018	CV
76	32" x 32"	Heavy metal witch hat	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
77	25" x 25"	Heavy metal witch hat	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
78	16" x 16"	Heavy metal witch hat	12/14/2018	CV	NEED CLEANING	12/21/2018	CV	NEED CLEANING	12/28/2018	CV
79	14" x 14"	Curb guard plus	12/14/2018	CV	OK	12/21/2018	CV	OK	12/28/2018	CV
80	24" Round	Heavy metal witch hat	12/14/2018	CV	OK	12/21/2018	CV	NEED CLEANING	12/28/2018	CV
81	10" x 18"	Heavy metal witch hat	12/14/2018	CV	NEED CLEANING	12/21/2018	CV	OK	12/28/2018	CV
82	19" x 19"	Heavy metal witch hat	12/14/2018	CV	OK	12/21/2018	CV	NEED CLEANING	12/28/2018	CV
83	18" x 18"	Heavy metal witch hat	12/14/2018	CV	OK	12/21/2018	CV	NEED CLEANING	12/28/2018	CV
85	10" x 18"	Heavy metal drain guard	12/4/2018	CV	NEED CLEANING	12/11/2018	CV	OK	12/18/2018	CV
86	19" x 19"	Heavy metal with sock	12/4/2018	CV	OK	12/11/2018	CV	OK	12/18/2018	CV
87	19" x 19"	Heavy metal with sock	12/4/2018	CV	OK	12/11/2018	CV	OK	12/18/2018	CV
88	20" x 20"	Heavy metal with sock	12/4/2018	CV	NEED CLEANING	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
89	48" x 26"	Heavy metal with sock	12/4/2018	CV	NEED CLEANING	12/11/2018	CV	OK	12/18/2018	CV
90	8" Round	Curb guard plus with sock	12/4/2018	CV	OK	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
91	18" x 18"	Inlet guard	12/4/2018	CV	OK	12/11/2018	CV	OK	12/18/2018	CV
97	24" x 1	Inlet guard	12/12/2018	CV	OK	12/19/2018	CV	NEED CLEANING	12/26/2018	CV
98	70" x 37"	Curb guard plus	12/13/2018	CV	NEED CLEANING	12/20/2018	CV	NEED CLEANING	12/27/2018	CV
99	48" x 40"	Heavy metal guard with boom	12/13/2018	CV	OK	12/20/2018	CV	OK	12/27/2018	CV
100	24" x 1	Heavy metal boom curb guard plus	12/12/2018	CV	OK	12/19/2018	CV	OK	12/26/2018	CV
101	37" x 27"	Curb guard plus	12/4/2018	CV	NEED CLEANING	12/11/2018	CV	OK	12/18/2018	CV
102	12" x 16"	Curb guard plus	12/4/2018	CV	OK	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
103	12" x 16"	Curb guard plus	12/4/2018	CV	OK	12/11/2018	CV	NEED CLEANING	12/18/2018	CV
104	36" Long	Curb guard plus	12/16/2018	CV	NEED CLEANING	12/19/2018	CV	OK	12/26/2018	CV
107	28" Round	Curb guard plus	12/3/2018	CV	OK	12/17/2018	CV	OK	12/31/2018	CV
108	32" x 32"	Heavy metal witch hat	12/3/2018	CV	NEED CLEANING	12/17/2018	CV	OK	12/31/2018	CV
109	48" x 48"	Heavy metal boom								
110	48" x 48"	Heavy metal boom								

KENNETH GURLES

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

Monthly Site Inspections

The site-wide inspection logs for October - December 2018 are attached. Any issues or deficiencies found during the site inspections are brought to the attention of area supervisors and followed up during the next round of inspection to make sure they are addressed and corrected. As part of the on-going effort to maintain good housekeeping practices at the site, equipment and materials that are no longer in use or have the potential to contribute to pollutant loading (i.e., leftover construction materials, rusted drums and dumpsters) are systematically identified and removed 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: 10-14-2018 Inspection Time: 10:00 AM
Inspector: MAURICE BANKS Inspector's Signature: 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?	✓		✓		✓		✓		✓		Contracted Work Management to removed all unused material
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?	✓		✓		✓		✓		✓		

Maurice Banks
10-14-2018

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?	✓		N/A								
Is the wash water captured properly -- not entering storm drain system?	✓		N/A								
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: 11-14-2018 Inspection Time: 10:00 AM
Inspector: M. Banks Inspector's Signature: [Signature]

	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?	✓		✓		✓		✓		✓		Talking to work Management about removing material
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?	✓		✓		✓		✓		✓		

Maurice Banks
10-4-2018



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?	✓		N/A								
Is the wash water captured properly -- not entering storm drain system?	✓		N/A								
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: 12/4-2018
Inspector: M. Banks

Inspection Time: 10:00 AM
Inspector's Signature: Maurice Banks



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?

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?

	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	
Are outside work areas clean, dry, and free of litter and debris?	✓		✓		✓		✓		✓		Remove material and clean litter and debris around Frac Tank
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?	✓		✓		✓		✓		✓		

Maurice Banks
10-14-2018

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?	✓		N/A						✓		
Is the wash water captured properly -- not entering storm drain system?	✓		N/A						✓		
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 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. 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 December 20, 2018. Since then, AECOM completed rerunning 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 system optimizations, which was reviewed and endorsed by CONTECH. A summary of these proposed treatment system optimization is included in an updated Table 1 (see attached). Pepco will continue working with AECOM to implement the proposed optimization adjustments to ensure that the treatment system is achieving pollutant removal efficiency consistent with the design targets. We will continue to update EPA on these efforts.

Pepco collected the fourth quarter stormwater sample from Outfall 013 during a qualifying storm event on December 2, 2018. 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	December 2, 2018 sampling results
Copper	mg/L	0.0134	0.00524	0.0026
Lead	mg/L	0.06458	0.0566	0.0011
Zinc	mg/L	0.117	0.073	0.0183
Cadmium	mg/L	0.00495	0.00208	<0.00025
Iron	mg/L	1	0.69	0.13
Total Suspended Solids	mg/L	100	30	2.4

Table 1. Recommended Initial Action Plan (Version 6)

Task Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)
1	Review As-built Drawings	All	AECOM completed a review of as-built drawings on 4/30/18. Filppo 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 6/8/18.	Pepco SWTM project team (Pepco, AECOM, and Filppo) 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 and Filppo 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.	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. Filppo 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.	Task Completed.	No update (12/20/18).	No update (01/17/19)
2	CCTV Inspection of Drainage System	AECOM/Pepco	CCTV Inspection completed; accumulated sediment and debris identified during inspection (9.5 tons) was removed as of 5/29/18.	AECOM submitted draft report and received comments from Pepco. CCTV Inspection Report (Rev Final) submitted to Pepco on 7/5/18.	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.
3	Test Functioning of the Check Valves	Filppo	Completed on 4/24/18.	The need and use of check valves will be evaluated as part of Task 1.	The check valves were determined to be not warranted. Filppo removed the check valves at FS-2 and FS-6 on 7/16/18 and 8/3/18, respectively.	Task completed.	No update (12/20/18).	No update (01/17/19)

Task Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)
not impeding flow								
• Filippo inspected the check valves and noted minor debris, but no blockage								
4	System Operation & Maintenance (O&M)	Jellyfish, StormFilters, and DownSpout StormFilters CONTECH/ i-Pepco/ i-STORMWATER (Pepco's O&M Contractor)	i-STORMWATER has performed two O&M inspections, 2/26/18 and 5/14/18 – 5/18/18. The most prevalent observation reported by i-STORMWATER was that only a fraction of stormwater was being diverted into the treatment units at the upstream flow splitters. Initial corrective action is to adjust flow splitters as necessary to ensure proper flow of stormwater into the treatment units. Additional corrective actions may be identified following completion of Task 1, which includes a full as-built review and hydraulic evaluation.	Following project team meeting on 6/13/18, O&M recommendations from i-STORMWATER were incorporated into the ICA table.	Recommendations have been addressed under Task 1.	Next O&M inspection by i-STORMWATER scheduled for November 2018.	O&M inspection completed by i-STORMWATER November 29, 2018.	No update (01/17/19)
5	Dry Condition Inspection	All	AECOM/ i-STORMWATER/ CONTECH	Completed on 5/15/18. Recommendations from i-STORMWATER are the same as above.	Following project team meeting on 6/13/18, Dry Conditions Inspection recommendations from i-STORMWATER were incorporated into the ICA table.	Recommendations have been addressed under Task 1. Following cleaning/flushing of the storm drain lines, AECOM completed an additional Dry Conditions inspection on 9/5/18 and 9/06/18, and no issues were noted. In addition, AECOM will lead	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 Filppo appear to have been done successfully; (b) Little to no observable flow (as	No update (12/20/18). See new Task 11. No update (01/17/19). See Task 11.

Task Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)
Impeding treatment.					CONTECH on an inspection of the systems on 9/21/18.	expected); and (c) No irregularities observed.		
6 Wet Condition Inspection	All	AECOM/ CONTECH/ i- STORMWATER	Completed on 5/18/18. Recommendations from i- STORMWATER are the same as above. Recommendations from CONTECH include: 1. Modifications or repairs at flow splitters to ensure proper flow to treatment system 2. Resealing of structures forebay walls, clearwell walls, and longitudinal wall-to-floor joints. 3. Investigation of potential backwater conditions at StormFilter units 4. Repair leaks at deck fasteners at Jellyfish JF-1. 5. Repair joint leak in weir wall to filter deck at inlet Jellyfish I68. AECOM has collected additional field data to determine necessary adjustments to flow splitters and will document findings in a tech memo expected by 6/08/18. Corrective actions will be implemented as soon as possible thereafter. Additional corrective actions may be identified following completion of Task 1, which includes a full as-built review and hydraulic evaluation.	Following project team meeting on 6/13/18, Dry and Wet Conditions inspection recommendations from i- STORMWATER and CONTECH were incorporated into the ICA table.	Recommendations have been addressed under Task 1. Following cleaning/flushing of the storm drain lines, an additional Wet Conditions inspection will be scheduled and led by AECOM. This is anticipated to be performed during a qualifying rain event in September 2018.	On 9/17/18 and 9/23/18, AECOM completed additional Wet Conditions inspections. Flow splitters (FS-1, -2, -3, -4, -5, and -6) and Jellyfish structures (JF-1, -3A, -3B, and -4) were observed to be functioning as designed, diverting and treating stormwater. Additional observations made at StormFilter Structures SF-1, -2, -3A, -3B, and -4 will require further evaluation to confirm design stormwater treatment. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11.	No update (12/20/18). See new Task 11.	No update (01/17/19). See Task 11.
7 Clean Jelly Fish Unit Deck	Jellyfish	Pepco/ i- STORMWATER	Based on O&M Inspection completed 5/14/18 – 5/18/18 by i- STORMWATER, no	No update (7/6/18).	No update (8/28/18).	Next O&M inspection by i- STORMWATER is scheduled for November 2018.	O&M inspection completed by i- STORMWATER November 29, 2018.	No update (01/17/19)
• Rationale: Per								

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8	Installation of Fixed Sampling Points	Jellyfish and StormFilters	AECOM/I- STORMWATER	Completed on 5/29/18.				
				No update (7/6/18).				
				Task completed.				
9	Additional Influent and Effluent Sampling	Jellyfish and StormFilters	AECOM/ CONTECH	To be scheduled for qualifying rain event following completion of Tasks 1-8.				
				No update (7/6/18).				
				Based on field observations during wet weather inspections following completion of system modification under Task 1, further evaluation is needed to confirm design stormwater				

CONTECH, sediment on JF deck could result in erroneous results

- CONTECH recommends cleaning of deck and backwash pool prior to sampling
- Sediment accumulates at these locations through grated covers or during bypass flow

Fixed SW sampling points were inspected and blank samples were collected during the Dry Conditions inspection on 9/5/18 and 9/6/18. The SW sampling points were observed to be functioning as intended.

Rationale: Recommended by CONTECH upon reviewing two rounds of initial acceptance testing results

- CONTECH recommends fixed, dedicated sample ports and using pumps for sampling
- CONTECH's approach facilitates collection of more representative treated/untreated samples

Based on a call with CONTECH technical staff, AECOM prepared a SOW for this installation

It is anticipated that additional sampling will be completed following implementation of the proposed optimizations. See new Task 11.

Task Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)
treatment system components - Results of initial acceptance testing sampling (completed April 2018) may not be representative of system performance due to lack of proper flow to treatment 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.						treatment before proceeding with additional influent and effluent sampling. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11.		
10 Flood Treatment Structures to Rinse Fines	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)
- 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	All	CONTECH/AECOM	NA	NA	NA	On 10/17/18, CONTECH completed an additional inspection of the StormFilters to confirm equipment type and configuration.	AECOM has completed rerunning the SWMM model for each hotspot based on additional data/information provided by CONTECH for	Contech agreed with the adjustments proposed by AECOM and proposed additional adjustments to improve flow management at

Task	Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)
	- Re-inspection of stormwater treatment units and components to confirm equipment type and configuration. - Investigate water quality inflows to each hot spot treatment unit - Initial routing calculations for each structure - Run the SWMM model to include the Jellyfish filler and StormFilter 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.						AECOM is currently working with CONTECH to evaluate the performance of the StormFilter systems based on the as-built configurations. AECOM is currently developing and running a SWMM model for each hotspot and for the system leading to Outfall #13 based on additional data/information provided by CONTECH for their proprietary treatment units. Based on this more detailed and site-specific modeling, AECOM and CONTECH 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.	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. Further treatment system optimization adjustments will be implemented based on final recommendations from AECOM and CONTECH.	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 treatment. Raising of weir walls at FS3 and FS4 is proposed to optimize the volume of stormwater that is being 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 MAV 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-flow 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 fourth quarter 2018.

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

Stormwater Pollution Prevention Plan

No update was made to the Plan during the fourth quarter 2018.

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

Change in Management Responsibilities

There was no change in management responsibilities during the fourth quarter 2018.

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.

The comparison of the August and September sampling results showed that concentrations of metals were significantly lowered (with an average reduction of approximately 50 percent) in both individual and composite samples, while the concentration of suspended solids was generally similar between sampling events. Results also indicated that the portion of drainage area contributing to the higher concentration of metals was unable to be determined at that time, and further monitoring of these inlets would be required.

Results from the December sampling again showed a decrease compared to those achieved in the August 2018 samples. Although stormwater sampling is inherently variable, this overall decrease in concentration may be attributable to on-going best management practices at the site, including ongoing routine vacuum street sweeping which Pepco is conducting within the Outfall 101 drainage area.

Pepco will be conducting additional discrete sampling of inlets to further investigate 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 fourth quarter 2018. Pepco collected the fourth quarter compliance samples from Outfall 013 during a qualifying storm event on December 2, 2018. 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)