

Via Electronic and US Mail - 7011 1150 0001 6024 3152

January 30, 2018

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) - Submission of quarterly reports for October - December 2017**

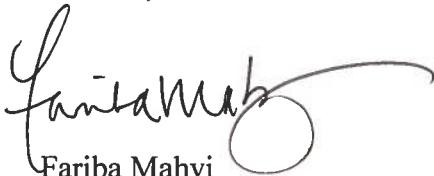
Dear Ms. Hopkins,

In accordance with Paragraph 68 of the Benning Facility Consent Decree, please find attached the following reports:

- Copies of DMRs for October - December 2017
- Status of annual inspection of drainage system
- Storm drain inlets inspection logs for October - December 2017
- Monthly site-wide inspection logs for October - December 2017
- Status of stormwater treatment system construction
- Stormwater management training update
- Stormwater pollution prevention plan update
- Change in management responsibilities
- Status of completion of Transformer Storage Shed
- Status of stormwater retention structure
- Description of any non-compliance with effluent limits

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

Sincerely,

A handwritten signature in black ink, appearing to read "Fariba Mahvi", with a large, stylized loop at the end.

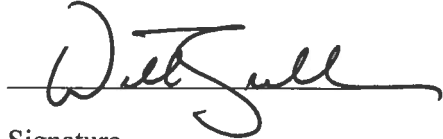
Fariba Mahvi  
Sr. Project Manager  
Environmental Services

## CERTIFICATION STATEMENT

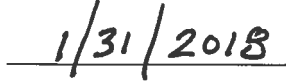
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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.

William Sullivan

Vice President, Electric and Gas Operations

A handwritten signature in black ink, appearing to read "Will Sullivan", written over a horizontal line.

Signature

A handwritten date "1/31/2018" in black ink, written over a horizontal line.

Date

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

Discharge Monitoring Reports

Copies of DMRs for October - December 2017 are attached.

003A

User: FARIBA12, Permittee User



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**DMR Copy of Submission**

**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 12/01/17 to 12/31/17  
**Status:** NetDMR Validated

**DMR Due Date:** 01/28/18

**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<br>Code Name                                                           | NODI  | Quantity or Loading |                     |             | Quality or Concentration                        |                                                 |         | Units        | #<br>of<br>Ex. | Freq. of<br>Analysis             | Smpl.<br>Type  |
|----------------------------------------------------------------------------------|-------|---------------------|---------------------|-------------|-------------------------------------------------|-------------------------------------------------|---------|--------------|----------------|----------------------------------|----------------|
|                                                                                  |       | Value 1             | Value 2             | Units       | Value 1                                         | Value 2                                         | Value 3 |              |                |                                  |                |
| 00400 pH<br>1 - Effluent Gross                                                   | Smpl. |                     |                     |             | =7.81                                           | =8                                              |         | 12 -<br>SU   | 0              | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| Season: 0                                                                        | Req.  |                     |                     |             | >=6 MINIMUM                                     | <=8.5 MAXIMUM                                   |         | 12 -<br>SU   |                | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| NODI: -                                                                          | NODI  |                     |                     |             |                                                 |                                                 |         |              |                |                                  |                |
| 00530 Solids,<br>total<br>suspended<br>1 - Effluent Gross                        | Smpl. |                     |                     |             | =21                                             | =21                                             |         | 19 -<br>mg/L | 0              | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| Season: 0                                                                        | Req.  |                     |                     |             | <=30 MO AVG                                     | <=100 DAILY<br>MX                               |         | 19 -<br>mg/L |                | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| NODI: -                                                                          | NODI  |                     |                     |             |                                                 |                                                 |         |              |                |                                  |                |
| 00556 Oil &<br>Grease<br>1 - Effluent Gross                                      | Smpl. |                     |                     |             |                                                 |                                                 |         |              |                |                                  |                |
| Season: 0                                                                        | Req.  |                     |                     |             | <=15 MO AVG                                     | <=20 DAILY MX                                   |         | 19 -<br>mg/L |                | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| NODI: -                                                                          | NODI  |                     |                     |             | B - Below<br>Detection<br>Limit/No<br>Detection | B - Below<br>Detection<br>Limit/No<br>Detection |         |              |                |                                  |                |
| 39496 PCB-1242<br>1 - Effluent Gross                                             | Smpl. |                     |                     |             |                                                 | =0                                              |         | 28 -<br>ug/L | 0              | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| Season: 0                                                                        | Req.  |                     |                     |             |                                                 | <=1 DAILY MX                                    |         | 28 -<br>ug/L |                | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| NODI: -                                                                          | NODI  |                     |                     |             |                                                 |                                                 |         |              |                |                                  |                |
| 39504 PCB-1254<br>1 - Effluent Gross                                             | Smpl. |                     |                     |             |                                                 | =0                                              |         | 28 -<br>ug/L | 0              | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| Season: 0                                                                        | Req.  |                     |                     |             |                                                 | <=1 DAILY MX                                    |         | 28 -<br>ug/L |                | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| NODI: -                                                                          | NODI  |                     |                     |             |                                                 |                                                 |         |              |                |                                  |                |
| 39508 PCB-1260<br>1 - Effluent Gross                                             | Smpl. |                     |                     |             |                                                 | =0                                              |         | 28 -<br>ug/L | 0              | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| Season: 0                                                                        | Req.  |                     |                     |             |                                                 | <=1 DAILY MX                                    |         | 28 -<br>ug/L |                | 01/DS -<br>Once Per<br>Discharge | GR -<br>GRAB   |
| NODI: -                                                                          | NODI  |                     |                     |             |                                                 |                                                 |         |              |                |                                  |                |
| 50050 Flow, in<br>conduit or<br>thru<br>treatment<br>plant<br>1 - Effluent Gross | Smpl. | =0.00549            | =0.00549            | 03 -<br>MGD | =0.00549                                        | =0.00549                                        |         | 03 -<br>MGD  | 0              | 01/DS -<br>Once Per<br>Discharge | MS -<br>MEASRD |
| Season: 0                                                                        | Req.  | Req Mon MO<br>AVG   | Req Mon DAILY<br>MX | 03 -<br>MGD | Req Mon MO<br>AVG                               | Req Mon DAILY<br>MX                             |         | 03 -<br>MGD  |                | 01/DS -<br>Once Per<br>Discharge | MS -<br>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: 2018-01-16 16:08 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2018-01-16 16:08 (Time Zone:-05:00)

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013A

 User: FARIBA12, Permittee User



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## DMR Copy of Submission

**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 11/01/17 to 12/31/17

**DMR Due Date:** 01/28/18

**Status:** NetDMR Validated

**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 | Units          |                             |             |
| 50050              | Flow, in conduit or thru treatment plant | Smpl. | =0.000957           | =0.01365         | 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**

TS000 - Toxicity Acute sampling requirement was met in 2013 in compliance with the permit condition, therefore, no additional 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:** 2018-01-18 08:55 (Time Zone:-05:00)

**Report Last Signed By**

**User:** FARIBA12  
**Name:** Fariba Mahvi  
**E-Mail:** fmahvi@pepco.com  
**Date/Time:** 2018-01-18 08:55 (Time Zone:-05:00)

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User: FARIBA12, Permittee User



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**DMR Copy of Submission**

**Permit**

**Permit ID:** DC0000094  
**Permittee:** PEPCO Environment Management Services

**Facility:** PEPCO - BENNING

**Permitted Feature:** 013 - External Outfall

**Report Dates & Status**

**Monitoring Period:** From 10/01/17 to 12/31/17

**Status:** NetDMR Validated

**Considerations for Form Completion**

NO BLOWDOWN

**Principal Executive Officer**

**First Name:** William  
**Title:** VP, Operations

**No Data Indicator (NODI)**

**Form NODI:** -

**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:** 01/28/18

**Last Name:** Sullivan  
**Telephone:** 202-872-2942

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

| Parameter          |                         | NODI  | Quantity or Loading |         |       | Quality or Concentration             |                |                                      |               | # of Ex.          | Freq. of Analysis | Smpl. Type |
|--------------------|-------------------------|-------|---------------------|---------|-------|--------------------------------------|----------------|--------------------------------------|---------------|-------------------|-------------------|------------|
| Code               | Name                    |       | Value 1             | Value 2 | Units | Value 1                              | Value 2        | Value 3                              | Units         |                   |                   |            |
| 00400              | pH                      | Smpl. |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| 1 - Effluent Gross |                         |       |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| Season: 0          |                         |       | Req.                |         |       |                                      | >=6 MINIMUM    |                                      | <=8.5 MAXIMUM | 12 - SU           | 01/90 - Quarterly | GR - GRAB  |
| NODI: -            |                         | NODI  |                     |         |       | E - Analysis Not Conducted/No Sample |                | E - Analysis Not Conducted/No Sample |               |                   |                   |            |
| 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  |                     |         |       | E - Analysis Not Conducted/No Sample |                | E - Analysis Not Conducted/No Sample |               |                   |                   |            |
| 00556              | Oil & Grease            | Smpl. |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| 1 - Effluent Gross |                         |       |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| Season: 0          |                         |       | Req.                |         |       |                                      | Req Mon MO AVG | Req Mon DAILY MX                     | 19 - mg/L     | 01/90 - Quarterly | GR - GRAB         |            |
| NODI: -            |                         | NODI  |                     |         |       | E - Analysis Not Conducted/No Sample |                | E - Analysis Not Conducted/No Sample |               |                   |                   |            |
| 01027              | Cadmium, total [as Cd]  | Smpl. |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| 1 - Effluent Gross |                         |       |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| Season: 0          |                         |       | Req.                |         |       |                                      | <=2.08 MO AVG  | <=4.95 DAILY MX                      | 28 - ug/L     | 01/90 - Quarterly | GR - GRAB         |            |
| NODI: -            |                         | NODI  |                     |         |       | E - Analysis Not Conducted/No Sample |                | E - Analysis Not Conducted/No Sample |               |                   |                   |            |
| 01042              | Copper, total [as Cu]   | Smpl. |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| 1 - Effluent Gross |                         |       |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| Season: 0          |                         |       | Req.                |         |       |                                      | <=5.24 MO AVG  | <=13.44 DAILY MX                     | 28 - ug/L     | 01/90 - Quarterly | GR - GRAB         |            |
| NODI: -            |                         | NODI  |                     |         |       | E - Analysis Not Conducted/No Sample |                | E - Analysis Not Conducted/No Sample |               |                   |                   |            |
| 01045              | Iron, total [as Fe]     | Smpl. |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| 1 - Effluent Gross |                         |       |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| Season: 0          |                         |       | Req.                |         |       |                                      | <=5.69 MO AVG  | <=1 DAILY MX                         | 28 - ug/L     | 01/90 - Quarterly | GR - GRAB         |            |
| NODI: -            |                         | NODI  |                     |         |       | E - Analysis Not Conducted/No Sample |                | E - Analysis Not Conducted/No Sample |               |                   |                   |            |
| 01051              | Lead, total [as Pb]     | Smpl. |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| 1 - Effluent Gross |                         |       |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| Season: 0          |                         |       | Req.                |         |       |                                      | <=56.6 MO AVG  | <=64.58 DAILY MX                     | 28 - ug/L     | 01/90 - Quarterly | GR - GRAB         |            |
| NODI: -            |                         | NODI  |                     |         |       | E - Analysis Not Conducted/No Sample |                | E - Analysis Not Conducted/No Sample |               |                   |                   |            |
| 01092              | Zinc, total [as Zn]     | Smpl. |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| 1 - Effluent Gross |                         |       |                     |         |       |                                      |                |                                      |               |                   |                   |            |
| Season: 0          |                         |       | Req.                |         |       |                                      | <=73.11 MO AVG | <=117.18 DAILY MX                    | 28 - ug/L     | 01/90 - Quarterly | GR - GRAB         |            |
| NODI: -            |                         | NODI  |                     |         |       | E - Analysis Not Conducted/No Sample |                | E - Analysis Not Conducted/No Sample |               |                   |                   |            |



| 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                              |           |                   |            |
| 39496              | PCB-1242 | Smpl. |                     |         |       |                          |         |                                      |           |                   |            |
| 1 - Effluent Gross |          |       |                     |         |       |                          |         |                                      |           |                   |            |
| Season: 0          |          |       | Req.                |         |       |                          |         | <=1 DAILY MX                         | 28 - ug/L | 01/90 - Quarterly | GR - GRAB  |
| NODI: -            |          | NODI  |                     |         |       |                          |         | E - Analysis Not Conducted/No Sample |           |                   |            |
| 39504              | PCB-1254 | Smpl. |                     |         |       |                          |         |                                      |           |                   |            |
| 1 - Effluent Gross |          |       |                     |         |       |                          |         |                                      |           |                   |            |
| Season: 0          |          |       | Req.                |         |       |                          |         | <=1 DAILY MX                         | 28 - ug/L | 01/90 - Quarterly | GR - GRAB  |
| NODI: -            |          | NODI  |                     |         |       |                          |         | E - Analysis Not Conducted/No Sample |           |                   |            |
| 39508              | PCB-1260 | Smpl. |                     |         |       |                          |         |                                      |           |                   |            |
| 1 - Effluent Gross |          |       |                     |         |       |                          |         |                                      |           |                   |            |
| Season: 0          |          |       | Req.                |         |       |                          |         | <=1 DAILY MX                         | 28 - ug/L | 01/90 - Quarterly | GR - GRAB  |
| NODI: -            |          | NODI  |                     |         |       |                          |         | 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**

As reported to EPA on January 2, 2018, Pepco had planned to collect the fourth quarter stormwater samples in December, however, the samples could not be collected because there was no qualifying storm event in December. Pepco plans to collect make-up samples from the next qualifying storm event in 2018 and submit the results to EPA.

**Attachments**

No attachments.

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

User: FARIBA12  
 Name: Fariba Mahvi  
 E-Mail: fmahvi@pepco.com  
 Date/Time: 2018-01-16 16:39 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
 Name: Fariba Mahvi  
 E-Mail: fmahvi@pepco.com  
 Date/Time: 2018-01-16 16:40 (Time Zone:-05:00)

10/2

User: FARIBA12, Permittee User



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**DMR Copy of Submission**

**Permit**

**Permit ID:** DC0000094  
**Permittee:** PEPCO Environment Management Services  
**Facility:** PEPCO - BENNING  
**Permitted Feature:** 101 - External Outfall

**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)

**Report Dates & Status**

**Monitoring Period:** From 10/01/17 to 12/31/17  
**Status:** NetDMR Validated

**DMR Due Date:** 01/28/18

**Considerations for Form Completion**

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

**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 |          |                   |            |

| Parameter<br>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                      | Smpl. |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| 1 - Effluent Gross            |       |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| Season: 0                     | Req.  |                     |         |       | >=6 MINIMUM                          |                                      | <=8.5 MAXIMUM                        | 12 - SU   |          | 01/90 - Quarterly | GR - GRAB  |
| NODI: -                       | NODI  |                     |         |       | E - Analysis Not Conducted/No Sample |                                      | E - Analysis Not Conducted/No Sample |           |          |                   |            |
| 00530 Solids, total suspended | Smpl. |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| 1 - Effluent Gross            |       |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| Season: 0                     | Req.  |                     |         |       |                                      | Req Mon MO AVG                       | Req Mon DAILY MX                     | 19 - mg/L |          | 01/90 - Quarterly | GR - GRAB  |
| NODI: -                       | NODI  |                     |         |       |                                      | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |           |          |                   |            |
| 00556 Oil & Grease            | Smpl. |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| 1 - Effluent Gross            |       |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| Season: 0                     | Req.  |                     |         |       |                                      | Req Mon MO AVG                       | Req Mon DAILY MX                     | 19 - mg/L |          | 01/90 - Quarterly | GR - GRAB  |
| NODI: -                       | NODI  |                     |         |       |                                      | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |           |          |                   |            |
| 00980 Iron, total recoverable | Smpl. |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| 1 - Effluent Gross            |       |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| Season: 0                     | Req.  |                     |         |       |                                      | Req Mon MO AVG                       | Req Mon DAILY MX                     | 19 - mg/L |          | 01/90 - Quarterly | GR - GRAB  |
| NODI: -                       | NODI  |                     |         |       |                                      | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |           |          |                   |            |
| 01027 Cadmium, total [as Cd]  | Smpl. |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| 1 - Effluent Gross            |       |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| Season: 0                     | Req.  |                     |         |       |                                      | Req Mon MO AVG                       | Req Mon DAILY MX                     | 28 - ug/L |          | 01/90 - Quarterly | GR - GRAB  |
| NODI: -                       | NODI  |                     |         |       |                                      | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |           |          |                   |            |
| 01042 Copper, total [as Cu]   | Smpl. |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| 1 - Effluent Gross            |       |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| Season: 0                     | Req.  |                     |         |       |                                      | Req Mon MO AVG                       | Req Mon DAILY MX                     | 28 - ug/L |          | 01/90 - Quarterly | GR - GRAB  |
| NODI: -                       | NODI  |                     |         |       |                                      | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |           |          |                   |            |
| 01051 Lead, total [as Pb]     | Smpl. |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| 1 - Effluent Gross            |       |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| Season: 0                     | Req.  |                     |         |       |                                      | Req Mon MO AVG                       | Req Mon DAILY MX                     | 28 - ug/L |          | 01/90 - Quarterly | GR - GRAB  |
| NODI: -                       | NODI  |                     |         |       |                                      | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |           |          |                   |            |
| 01067 Nickel, total [as Ni]   | Smpl. |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| 1 - Effluent Gross            |       |                     |         |       |                                      |                                      |                                      |           |          |                   |            |
| Season: 0                     | Req.  |                     |         |       |                                      | Req Mon MO AVG                       | Req Mon DAILY MX                     | 28 - ug/L |          | 01/90 - Quarterly | GR - GRAB  |
| NODI: -                       | 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                              |                      |                                     |                |
| 01092     | Zinc, total<br>[as Zn]                               |       |                     |         |       |                          | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |                      |                                     |                |
|           | 1 - Effluent Gross                                   | Smpl. |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | Season: 0                                            | Req.  |                     |         |       |                          | Req Mon MO<br>AVG                    | Req Mon DAILY<br>MX                  | 28 -<br>ug/L         | 01/90 -<br>Quarterly                | GR -<br>GRAB   |
|           | NODI: -                                              | NODI  |                     |         |       |                          | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |                      |                                     |                |
| 39496     | PCB-1242                                             |       |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | 1 - Effluent Gross                                   | Smpl. |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | Season: 0                                            | Req.  |                     |         |       |                          | Req Mon MO<br>AVG                    | Req Mon DAILY<br>MX                  | 28 -<br>ug/L         | 01/90 -<br>Quarterly                | GR -<br>GRAB   |
|           | NODI: -                                              | NODI  |                     |         |       |                          | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |                      |                                     |                |
| 39504     | PCB-1254                                             |       |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | 1 - Effluent Gross                                   | Smpl. |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | Season: 0                                            | Req.  |                     |         |       |                          | Req Mon MO<br>AVG                    | Req Mon DAILY<br>MX                  | 28 -<br>ug/L         | 01/90 -<br>Quarterly                | GR -<br>GRAB   |
|           | NODI: -                                              | NODI  |                     |         |       |                          | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |                      |                                     |                |
| 39508     | PCB-1260                                             |       |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | 1 - Effluent Gross                                   | Smpl. |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | Season: 0                                            | Req.  |                     |         |       |                          | Req Mon MO<br>AVG                    | Req Mon DAILY<br>MX                  | 28 -<br>ug/L         | 01/90 -<br>Quarterly                | GR -<br>GRAB   |
|           | NODI: -                                              | NODI  |                     |         |       |                          | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |                      |                                     |                |
| 50050     | Flow, in<br>conduit or<br>thru<br>treatment<br>plant |       |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | 1 - Effluent Gross                                   | Smpl. |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | Season: 0                                            | Req.  |                     |         |       |                          | Req Mon MO<br>AVG                    | Req Mon DAILY<br>MX                  | 03 -<br>MGD          | 01/90 -<br>Quarterly                | ES -<br>ESTIMA |
|           | NODI: -                                              | NODI  |                     |         |       |                          | E - Analysis Not Conducted/No Sample | E - Analysis Not Conducted/No Sample |                      |                                     |                |
| TS000     | Toxicity,<br>Acute                                   |       |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | 1 - Effluent Gross                                   | Smpl. |                     |         |       |                          |                                      |                                      |                      |                                     |                |
|           | Season: 0                                            | Req.  |                     |         |       |                          | Req Mon MO<br>AVG                    | Req Mon DAILY<br>MX                  | 2F -<br>tox<br>acute | 01/5Y -<br>Once<br>Every 5<br>Years | 24 -<br>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**

1. As reported to EPA on January 2, 2018, Pepco had planned to collect the fourth quarter stormwater samples in December, however, the samples could not be collected because there was no qualifying storm event in December. Pepco plans to collect make-up samples from the next qualifying storm event in 2018. 2. Toxicity Acute testing requirement was met, therefore, no analysis 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: 2018-01-16 17:13 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2018-01-16 17:16 (Time Zone:-05:00)

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**DMR Copy of Submission**

**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 10/01/17 to 12/31/17**DMR Due Date:** 01/31/18**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 |         |         | # 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 |         |                  | # 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. |                     |                  |          | =7.63                    |         | =7.64            | 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. |                     |                  |          | =4.4                     |         | =4.4             | 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. |                     |                  |          | <5.4                     |         | <5.4             | 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. | =0.00125            | =0.01365         | 03 - MGD | =0.00125                 |         | =0.01365         | 03 - MGD  | 0                 | 01/90 - Quarterly ES - ESTIMA |
| Season: 0          |                                          | Req.  | Req Mon MO AVG      | Req Mon DAILY MX | 03 - MGD | Req Mon MO AVG           |         | Req Mon DAILY MX | 03 - MGD  |                   | 01/90 - Quarterly ES - ESTIMA |
| NODI: -            |                                          | NODI  |                     |                  |          |                          |         |                  |           |                   |                               |

**Submission Note**

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

**Edit Check Errors**

No errors.

**Comments****Attachments**

No attachments.

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

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2018-01-18 09:17 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2018-01-18 09:17 (Time Zone:-05:00)

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## DMR Copy of Submission

**Permit**

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

**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

**Report Dates & Status**

**Monitoring Period:** From 10/01/17 to 12/31/17  
**Status:** NetDMR Validated

**DMR Due Date:** 01/31/18

**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 |          |                   |            |

https://netdum.org/wiki/netdum/protected/secret\_key.html?flowId=unauthenticated\_access\_en 1/16/2010



**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: 2018-01-16 17:22 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2018-01-16 17:23 (Time Zone:-05:00)

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**DMR Copy of Submission**

**Permit**

**Permit ID:** DC0000094  
**Permittee:** PEPCO Environment Management Services  
**Facility:** PEPCO - BENNING  
**Permitted Feature:** 202 - External Outfall

**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

**Report Dates & Status**

**Monitoring Period:** From 10/01/17 to 12/31/17  
**Status:** NetDMR Validated

**DMR Due Date:** 01/31/18

**Considerations for Form Completion**

Net Value of PCBs

**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 |          |                   |            |

| Parameter          |                                          | NODI  | Quantity or Loading |                  |                  | Quality or Concentration |         |                  | # of Ex.         | Freq. of Analysis | Smpl. Type        |
|--------------------|------------------------------------------|-------|---------------------|------------------|------------------|--------------------------|---------|------------------|------------------|-------------------|-------------------|
| Code               | Name                                     |       | Value 1             | Value 2          | Units            | Value 1                  | Value 2 | Value 3          |                  |                   |                   |
| 00010              | Temperature, water deg. centigrade       | Smpl. |                     |                  |                  |                          |         |                  |                  |                   |                   |
| 1 - Effluent Gross |                                          |       |                     |                  |                  |                          |         |                  |                  |                   |                   |
| Season: 0          | Req.                                     |       |                     |                  |                  |                          |         | <=2.8 DAILY MX   | 04 - deg C       | 01/90 - Quarterly | MS - MEASRD       |
| NODI: -            | NODI                                     |       |                     |                  |                  |                          |         | C - No Discharge |                  |                   |                   |
| 00400              | pH                                       | Smpl. |                     |                  |                  |                          |         |                  |                  |                   |                   |
| 1 - Effluent Gross |                                          |       |                     |                  |                  |                          |         |                  |                  |                   |                   |
| Season: 0          | Req.                                     |       |                     |                  | >=6 MINIMUM      |                          |         | <=8.5 MAXIMUM    | 12 - SU          | 01/90 - Quarterly | GR - GRAB         |
| NODI: -            | NODI                                     |       |                     |                  | C - No Discharge |                          |         | C - No Discharge |                  |                   |                   |
| 01034              | Chromium, total [as Cr]                  | Smpl. |                     |                  |                  |                          |         |                  |                  |                   |                   |
| 2 - Effluent Net   |                                          |       |                     |                  |                  |                          |         |                  |                  |                   |                   |
| Season: 0          | Req.                                     |       |                     |                  |                  |                          |         | <=.2 MO AVG      | <=.2 DAILY MX    | 19 - mg/L         | 01/90 - Quarterly |
| NODI: -            | NODI                                     |       |                     |                  |                  |                          |         | C - No Discharge | C - No Discharge |                   | GR - GRAB         |
| 01092              | Zinc, total [as Zn]                      | Smpl. |                     |                  |                  |                          |         |                  |                  |                   |                   |
| 2 - Effluent Net   |                                          |       |                     |                  |                  |                          |         |                  |                  |                   |                   |
| Season: 0          | Req.                                     |       |                     |                  |                  |                          |         | <=1 MO AVG       | <=1 DAILY MX     | 19 - mg/L         | 01/90 - Quarterly |
| NODI: -            | NODI                                     |       |                     |                  |                  |                          |         | C - No Discharge | C - No Discharge |                   | GR - GRAB         |
| 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 |
| NODI: -            | NODI                                     |       |                     |                  |                  |                          |         | C - No Discharge | C - No Discharge |                   | GR - GRAB         |
| 71871              |                                          | Smpl. |                     |                  |                  |                          |         |                  |                  |                   |                   |

| Parameter          |                                                | NODI | Quantity or Loading |         |       | Quality or Concentration |                     |         | # of Ex.     | Freq. of Analysis    | Smpl. Type   |
|--------------------|------------------------------------------------|------|---------------------|---------|-------|--------------------------|---------------------|---------|--------------|----------------------|--------------|
| Code               | Name<br>Bromine,<br>reported as<br>the element |      | Value 1             | Value 2 | Units | Value 1                  | Value 2             | Value 3 |              |                      |              |
| 1 - Effluent Gross |                                                |      |                     |         |       |                          |                     |         |              |                      |              |
| Season: 0          |                                                | Req. |                     |         |       | Req Mon MO<br>AVG        | Req Mon DAILY<br>MX |         | 19 -<br>mg/L | 01/90 -<br>Quarterly | GR -<br>GRAB |
| NODI: -            |                                                | NODI |                     |         |       | C - No<br>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: 2018-01-16 17:40 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
 Name: Fariba Mahvi  
 E-Mail: fmahvi@pepco.com  
 Date/Time: 2018-01-16 17:40 (Time Zone:-05:00)

202 B

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 User: FARIBA12, Permittee User





**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:** 202-B - COOLING TOWER BASIN WASH WATER

**Permitted Feature:** 202 - External Outfall

**Report Dates & Status**

**Monitoring Period:** From 10/01/17 to 12/31/17  
**Status:** NetDMR Validated

**DMR Due Date:** 01/31/18

**Considerations for Form Completion**

COOLING TOWER UNITS 15 & 16

**Principal Executive Officer**

**First Name:** William  
**Title:** VP, Operations

**Last Name:** Sullivan  
**Telephone:** 202-872-2942

**No Data Indicator (NODI)**

**Form NODI:** -

| Parameter<br>Code Name                                     | NODI  | Quantity or Loading |                     |             | Quality or Concentration |                   |                  | #<br>of<br>Ex. | Freq. of<br>Analysis | Smpl.<br>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 -<br>SU     | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             | C - No<br>Discharge      |                   | C - No Discharge |                |                      |                |
| 00530 Solids,<br>total<br>suspended                        | Smpl. |                     |                     |             |                          |                   |                  |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |                   |                  |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             | <=30 MO AVG              | <=100 DAILY<br>MX |                  | 19 -<br>mg/L   | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             | C - No<br>Discharge      |                   | C - No Discharge |                |                      |                |
| 39496 PCB-1242                                             | Smpl. |                     |                     |             |                          |                   |                  |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |                   |                  |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             |                          | <=1 DAILY MX      |                  | 28 -<br>ug/L   | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             |                          | C - No Discharge  |                  |                |                      |                |
| 39504 PCB-1254                                             | Smpl. |                     |                     |             |                          |                   |                  |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |                   |                  |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             |                          | <=1 DAILY MX      |                  | 28 -<br>ug/L   | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             |                          | C - No Discharge  |                  |                |                      |                |
| 39508 PCB-1260                                             | Smpl. |                     |                     |             |                          |                   |                  |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |                   |                  |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             |                          | <=1 DAILY MX      |                  | 28 -<br>ug/L   | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             |                          | C - No Discharge  |                  |                |                      |                |
| 50050 Flow, in<br>conduit or<br>thru<br>treatment<br>plant | Smpl. |                     |                     |             |                          |                   |                  |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |                   |                  |                |                      |                |
| Season: 0                                                  | Req.  | Req Mon MO<br>AVG   | Req Mon DAILY<br>MX | 03 -<br>MGD |                          |                   |                  |                | 01/90 -<br>Quarterly | ES -<br>ESTIMA |
| NODI: -                                                    | NODI  | C - No<br>Discharge | C - No<br>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: 2018-01-16 17:36 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2018-01-16 17:37 (Time Zone:-05:00)

203A

User: FARIBA12, Permittee User



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**DMR Copy of Submission**

**Permit**

**Permit ID:** DC0000094  
**Permittee:** PEPCO Environment Management Services  
**Facility:** PEPCO - BENNING  
**Permitted Feature:** 203 - External Outfall

**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

**Report Dates & Status**

**Monitoring Period:** From 10/01/17 to 12/31/17  
**Status:** NetDMR Validated

**DMR Due Date:** 01/31/18

**Considerations for Form Completion**

Net Value of PCBs

**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 |          |                   |            |



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

**Submission Note**

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

**Edit Check Errors**

No errors.

**Comments****Attachments**

No attachments.

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

User: FARIBA12  
 Name: Fariba Mahvi  
 E-Mail: fmahvi@pepco.com  
 Date/Time: 2018-01-16 17:45 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
 Name: Fariba Mahvi  
 E-Mail: fmahvi@pepco.com  
 Date/Time: 2018-01-16 17:45 (Time Zone:-05:00)

203B



User: FARIBA12, Permittee User



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**DMR Copy of Submission**

**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:** 203-B - COOLING TOWER BASIN WASH WATER

**Permitted Feature:** 203 - External Outfall

**DMR Due Date:** 01/31/18

**Report Dates & Status**

**Monitoring Period:** From 10/01/17 to 12/31/17

**Status:** NetDMR Validated

**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<br>Code Name                                     | NODI  | Quantity or Loading |                     |             | Quality or Concentration |             |                   |              | #<br>of<br>Ex. | Freq. of<br>Analysis | Smpl.<br>Type  |
|------------------------------------------------------------|-------|---------------------|---------------------|-------------|--------------------------|-------------|-------------------|--------------|----------------|----------------------|----------------|
|                                                            |       | Value 1             | Value 2             | Units       | Value 1                  | Value 2     | Value 3           | Units        |                |                      |                |
| 00400 pH                                                   | Smpl. |                     |                     |             |                          |             |                   |              |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |             |                   |              |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             | >=6 MINIMUM              |             | <=8.5 MAXIMUM     | 12 -<br>SU   |                | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             | C - No<br>Discharge      |             | C - No Discharge  |              |                |                      |                |
| 00530 Solids,<br>total<br>suspended                        | Smpl. |                     |                     |             |                          |             |                   |              |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |             |                   |              |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             |                          | <=30 MO AVG | <=100 DAILY<br>MX | 19 -<br>mg/L |                | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             | C - No<br>Discharge      |             | C - No Discharge  |              |                |                      |                |
| 39496 PCB-1242                                             | Smpl. |                     |                     |             |                          |             |                   |              |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |             |                   |              |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             |                          |             | <=1 DAILY MX      | 28 -<br>ug/L |                | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             |                          |             | C - No Discharge  |              |                |                      |                |
| 39504 PCB-1254                                             | Smpl. |                     |                     |             |                          |             |                   |              |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |             |                   |              |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             |                          |             | <=1 DAILY MX      | 28 -<br>ug/L |                | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             |                          |             | C - No Discharge  |              |                |                      |                |
| 39508 PCB-1260                                             | Smpl. |                     |                     |             |                          |             |                   |              |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |             |                   |              |                |                      |                |
| Season: 0                                                  | Req.  |                     |                     |             |                          |             | <=1 DAILY MX      | 28 -<br>ug/L |                | 01/90 -<br>Quarterly | GR -<br>GRAB   |
| NODI: -                                                    | NODI  |                     |                     |             |                          |             | C - No Discharge  |              |                |                      |                |
| 50050 Flow, in<br>conduit or<br>thru<br>treatment<br>plant | Smpl. |                     |                     |             |                          |             |                   |              |                |                      |                |
| 1 - Effluent Gross                                         |       |                     |                     |             |                          |             |                   |              |                |                      |                |
| Season: 0                                                  | Req.  | Req Mon MO<br>AVG   | Req Mon DAILY<br>MX | 03 -<br>MGD |                          |             |                   |              |                | 01/90 -<br>Quarterly | ES -<br>ESTIMA |
| NODI: -                                                    | NODI  | C - No<br>Discharge | C - No<br>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: 2018-01-16 17:48 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2018-01-16 17:48 (Time Zone:-05:00)



User: FARIBA12, Permittee User



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**DMR Copy of Submission**

**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 11/01/17 to 11/30/17  
**Status:** NetDMR Validated

**DMR Due Date:** 12/28/17

**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 | 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. |                     |                  |          |                          |                  |                  |           |                            |             |
| 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 OWS in November 2017.

**Attachments**

No attachments.

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

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2017-12-20 17:30 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2017-12-20 17:30 (Time Zone:-05:00)

---

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**DMR Copy of Submission**

**Permit**

**Permit ID:** DC0000094  
**Permittee:** PEPCO Environment Management Services

**Facility:** PEPCO - BENNING

**Permitted Feature:** 003 - External Outfall

**Report Dates & Status**

**Monitoring Period:** From 10/01/17 to 10/31/17  
**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:** 11/28/17

**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 |          |                   |            |



**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: 2017-11-27 16:38 (Time Zone:-05:00)

**Report Last Signed By**

User: FARIBA12  
Name: Fariba Mahvi  
E-Mail: fmahvi@pepco.com  
Date/Time: 2017-11-27 16:39 (Time Zone:-05:00)

---

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**DMR Copy of Submission**

**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

**DMR Due Date:** 11/28/17

**Report Dates & Status**

**Monitoring Period:** From 09/01/17 to 10/31/17  
**Status:** NetDMR Validated

**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<br>Code  | Name                                                 | NODI  | Quantity or Loading |                     |             | Quality or Concentration                   |                                            |         | Units                | #<br>of<br>Ex. | Freq. of<br>Analysis                 | Smpl.<br>Type  |
|--------------------|------------------------------------------------------|-------|---------------------|---------------------|-------------|--------------------------------------------|--------------------------------------------|---------|----------------------|----------------|--------------------------------------|----------------|
|                    |                                                      |       | Value 1             | Value 2             | Units       | Value 1                                    | Value 2                                    | Value 3 |                      |                |                                      |                |
| 50050              | Flow, in<br>conduit or<br>thru<br>treatment<br>plant | Smpl. | =0.002024           | =0.0153             | 03 -<br>MGD |                                            |                                            |         |                      | 0              | 01/60 -<br>Once<br>Every 2<br>Months | ES -<br>ESTIMA |
| 1 - Effluent Gross |                                                      |       |                     |                     |             |                                            |                                            |         |                      |                |                                      |                |
| Season: 0          |                                                      | Req.  | Req Mon MO<br>AVG   | Req Mon DAILY<br>MX | 03 -<br>MGD |                                            |                                            |         |                      |                | 01/60 -<br>Once<br>Every 2<br>Months | ES -<br>ESTIMA |
| NODI: -            |                                                      |       |                     |                     |             |                                            |                                            |         |                      |                |                                      |                |
| TS000              | Toxicity,<br>Acute                                   | Smpl. |                     |                     |             |                                            |                                            |         |                      |                |                                      |                |
| 1 - Effluent Gross |                                                      |       |                     |                     |             |                                            |                                            |         |                      |                |                                      |                |
| Season: 0          |                                                      | Req.  |                     |                     |             | Opt Mon DAILY<br>AV                        | Opt Mon DAILY<br>MX                        |         | 2F -<br>tox<br>acute |                | 01/5Y -<br>Once<br>Every 5<br>Years  | 24 -<br>COMP24 |
| NODI: -            |                                                      |       |                     |                     |             |                                            |                                            |         |                      |                |                                      |                |
|                    |                                                      |       |                     |                     |             | E - Analysis Not<br>Conducted/No<br>Sample | E - Analysis Not<br>Conducted/No<br>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 NPDES permit; no additional sampling is required.

**Attachments**

No attachments.

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

**User:** FARIBA12  
**Name:** Fariba Mahvi  
**E-Mail:** fmahvi@pepco.com  
**Date/Time:** 2017-11-27 16:52 (Time Zone:-05:00)

**Report Last Signed By**

**User:** FARIBA12  
**Name:** Fariba Mahvi  
**E-Mail:** fmahvi@pepco.com  
**Date/Time:** 2017-11-27 16:52 (Time Zone:-05:00)



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

Annual Inspection of the Drainage System

The annual inspection of the drainage system was postponed until after the construction of the stormwater treatment system was completed. The construction was completed in December 2017. Therefore, the drainage system inspection will be conducted in the first quarter 2018, weather permitting.

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

Storm Drain Inlets Inspection Logs

The inspection logs for October - December 2017 are attached.

## Weekly Inspections of Drain Guards 2017

| Drain Number | Description | Corrosion Type             | Normal Inspection Date | Inspected by | Comments | Inspection Date | Inspected by | Comments | Inspection Date | Inspected by | Comments |
|--------------|-------------|----------------------------|------------------------|--------------|----------|-----------------|--------------|----------|-----------------|--------------|----------|
| 1            | 24"x36"     | Drain guard plus           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 2            | 27"x27"     | Heavy metal witch hat      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 3            | 27"x27"     | Heavy metal witch hat      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 4            | 24"x24"     | Heavy metal witch hat      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 5            | 24"x24"     | Heavy metal witch hat      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 6            | 24"x24"     | Drain guard plus           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 7            | 36"x63"     | Drain guard plus           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 8            | 28" Round   | Heavy metal witch hat      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 9            | 24" Round   | Heavy metal sock           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 10           | 18" Round   | Heavy metal with tin sock  | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 11           | 24" Round   | Heavy metal with tin sock  | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 12           | 24" Round   | Heavy metal sock           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 13           | 48" Round   | Heavy metal sock           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 14           | 70"x90"     | Drain guard plus           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 15           | 36"x60"     | Heavy metal with sock      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 16           | 34" Round   | Heavy metal sock           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 17           | 45"x45"     | Heavy metal sock           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 18           | 31"x31"     | Heavy metal sock           | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 19           | 31"x31"     | Heavy metal with sock      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 20           | 27"x49"     | Heavy metal with sock      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 21           | 24" Round   | Heavy metal with sock      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 24           | 18"x25"     | Drain guard plus with sock | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 25           | 30" Round   | Drain guard plus with sock | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 28           | 30" Round   | Drain guard plus with sock | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 29           | 24" Round   | Drain guard plus with sock | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 30           | 24" Round   | Drain guard plus with sock | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 33           | 24" Round   | Heavy metal with sock      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 37           | 27"x27"     | Heavy metal with sock      | 10/27/2017             | CV           | Found OK | 10/30/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 38           | 117" Long   | Curb guard plus            | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/30/2017      | CV           | Found OK |
| 39           | 117" Long   | Curb guard plus            | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 40           | 231" Long   | Curb guard plus            | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 42           | 27"x27"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 43           | 27"x27"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 44           | 27"x27"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 45           | 231" Long   | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 46           | 27"x27"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 47           | 27"x27"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 48           | 24"x24"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 49           | 145"x12"    | Heavy metal witch hat      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 50           | 29"x32"     | Heavy metal witch hat      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 51           | 65"x49"     | Heavy metal witch hat      | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 52           | 24" Round   | Heavy metal witch hat      | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 53           | 145"x12"    | Heavy metal witch hat      | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 54           | 117" Long   | Curb guard plus            | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 55           | 117" Long   | Curb guard plus            | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 56           | 35"x35"     | Heavy metal with sock      | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 57           | 24" Round   | Heavy metal with sock      | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 58           | 35"x35"     | Heavy metal witch hat      | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 60           | 59" Long    | Curb guard plus            | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 61           | 117" Long   | Curb guard plus            | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 62           | 117" Long   | Curb guard plus            | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 63           | 117" Long   | Curb guard plus            | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 64           | 117" Long   | Curb guard plus            | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 65           | 24"x27"     | Heavy metal witch hat      | 10/4/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 66           | 50"x45"     | Heavy metal witch hat      | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 67           | 24" Round   | Heavy metal witch hat      | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 68           | 86" Long    | Curb guard plus            | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 69           | 70"x37"     | Curb guard plus            | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 70           | 70"x37"     | Curb guard plus            | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 71           | 24"x37"     | Curb guard plus            | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 72           | 24"x37"     | Curb guard plus            | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 73           | 24"x37"     | Curb guard plus            | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 74           | 37"x22"     | Heavy metal witch hat      | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 75           | 24" Round   | Heavy metal with sock      | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 76           | 37"x22"     | Heavy metal witch hat      | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 77           | 35"x35"     | Heavy metal witch hat      | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 78           | 16"x16"     | Heavy metal witch hat      | 10/6/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 79           | 14"x14"     | Curb guard plus            | 10/6/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 80           | 24" Round   | Heavy metal witch hat      | 10/6/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 81           | 10"x18"     | Heavy metal witch hat      | 10/6/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 82           | 19x19"      | Heavy metal witch hat      | 10/6/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 83           | 19"x19"     | Heavy metal drain guard    | 10/6/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 85           | 10"x18"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 86           | 19"x19"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 87           | 19"x19"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 88           | 20"x20"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 89           | 48"x36"     | Heavy metal with sock      | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 90           | 8" Round    | Curb guard plus with sock  | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 91           | 18"x18"     | Inlet guard                | 10/3/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |
| 98           | 70"x37"     | Sock                       | 10/5/2017              | CV           | Found OK | 10/16/2017      | CV           | Found OK | 10/31/2017      | CV           | Found OK |



**Weekly Inspection of Drain Guards 2017**

[illegible]







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

Monthly Inspections

The site-wide inspection logs for October - December 2017 are attached. Minor issues were found during certain inspections as noted on the inspection logs (i.e., storm drain maintenance) and brought to the attention of the on-site contractor (Clean Venture) to take corrective actions. During the subsequent inspections, the drains were inspected to confirm that the issues were resolved.

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: 10-8-17  
Inspector: Terry McLean

Inspection Time: 8:40  
Inspector's Signature: Terry McLean



**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?                                                         | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |                                          |
| 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?                                                   |                         | ✓  |                           | ✓  |               |    |                  |    | ✓              |    | CHAINS 06-08 NEED TO BE<br>FIX OR REPAIR |
| <b>Spill Prevention &amp; Response</b>                                                                                    |                         |    |                           |    |               |    |                  |    |                |    | CONTACT CLEANING VENTURES FOR REPAIR     |
| 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?                                                                     | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |                                          |

Terry Mamm

10-9-17

6828



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?                     | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| <b>Structural Control Devices</b>                                                                             |                         |    |                           |    |               |    |                  |    |                |    |          |
| Has the vehicle wash catch basin been inspected for sediment build-up?                                        | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| Is the wash water captured properly -- not entering storm drain system?                                       | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| <b>Erosion and Sediment Controls</b>                                                                          |                         |    |                           |    |               |    |                  |    |                |    |          |
| 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?                                         |                         | ✓  |                           | ✓  |               | ✓  |                  | ✓  |                | ✓  |          |
| <b>Other Indicators of Illicit Discharges</b>                                                                 |                         |    |                           |    |               |    |                  |    |                |    |          |
| 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: 11-7-17  
 Inspector: Terry Maurer

Inspection Time: 1135  
 Inspector's Signature: Terry Maurer



**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?                                                         | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| 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?                                                   | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| <b>Spill Prevention &amp; Response</b>                                                                                    |                         |    |                           |    |               |    |                  |    |                |    |          |
| 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?                                                                     | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |

OF  
 broom gravel filtered cloth over  
 covered  
 drain

*Lenny Casanova*  
11-7-17  
1030



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?                     | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| <b>Structural Control Devices</b>                                                                             |                         |    |                           |    |               |    |                  |    |                |    |          |
| Has the vehicle wash catch basin been inspected for sediment build-up?                                        | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| Is the wash water captured properly -- not entering storm drain system?                                       |                         |    |                           |    |               |    |                  |    |                |    |          |
| <b>Erosion and Sediment Controls</b>                                                                          |                         |    |                           |    |               |    |                  |    |                |    |          |
| 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?                                         |                         | ✓  |                           | ✓  |               | ✓  |                  | ✓  |                | ✓  |          |
| <b>Other Indicators of Illicit Discharges</b>                                                                 |                         |    |                           |    |               |    |                  |    |                |    |          |
| 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: 12-13-17

Inspection Time: 0815

Inspector: Terry Memon

Inspector's Signature: Terry Memon



|                                                                                                                           | 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 |          |
| <b>Good Housekeeping Procedures</b>                                                                                       |                         |    |                           |    |               |    |                  |    |                |    |          |
| 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?                                                   | ✓                       |    |                           | ✓  |               | ✓  |                  | ✓  |                | ✓  |          |
| <b>Spill Prevention &amp; Response</b>                                                                                    |                         |    |                           |    |               |    |                  |    |                |    |          |
| 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?                                                                     | ✓                       |    | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |



Have all spills been properly cleaned up and disposed of properly in the respective area?

**Structural Control Devices**

Has the vehicle wash catch basin been inspected for sediment build-up?

Is the wash water captured properly – not entering storm drain system?

**Erosion and Sediment Controls**

Is there any soil erosion, dust or sediment build-up entering the storm drain inlets?

Are there uncovered pile of soil or junk metal equipment in the area?

**Other Indicators of Illicit Discharges**

Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?

Pepco – Benning Road Facility  
Site Wide Monthly Inspection Report

| 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 |          |
| ✓                       | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| ✓                       | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
| ✓                       | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |
|                         |                           |    |               |    |                  |    |                |    |          |
| ✓                       | ✓                         |    |               | ✓  |                  | ✓  |                | ✓  |          |
|                         | ✓                         |    |               | ✓  |                  | ✓  |                | ✓  |          |
|                         |                           |    |               |    |                  |    |                |    |          |
|                         |                           |    |               |    |                  |    |                |    |          |
| ✓                       | ✓                         |    | ✓             |    | ✓                |    | ✓              |    |          |

Terry Morrow  
12-13-17  
0830

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

Status of Stormwater Treatment System

The construction of the stormwater treatment system was completed on December 22, 2017, and the system has been placed into operation. The construction was completed in advance of December 31, 2017 deadline under the Benning Consent Decree.

Construction Activities:

Construction work started on September 11, and was completed on December 22. Flippo Construction worked diligently throughout the construction phase in order to meet the project deadline, deploying multiple crews to the job to compensate for the delayed start-up (due to the extended time required for DOEE to approve the 100% civil design).

A list of the Contech Treatment Units (BMPs) installed at each hot spot is attached.

Each unit passed the 72-hour leak test as required by DOEE to ensure that the system was leak free. Flippo notified DOEE when the leak testing was being conducted, and subsequently obtained approval to backfill the site once each system passed the test.

There was one major change to the original design that required DOEE approval as follows:

At Hot Spot 3, Flippo identified unknown existing underground utilities during the utility clearance in the field, which were in conflict with the storm drain pipe alignments and the footprint for the treatment system structures under the approved design. Accordingly, the length of the drainage pipe was increased and the foot prints of the treatment structures were revised by AECOM, increasing the pipe size from 30" to 36" and increasing the size of nearly all non-Contech structures such as manholes. The sizes and numbers of BMPs and filter cartridges remained the same. The revised design was submitted to DOEE and was approved.

DOEE Construction and Maintenance Enforcement Branch inspected the construction site on a weekly basis, providing oversight on sediment and erosion control measures and related construction activities. Flippo provided a two-week look ahead construction schedule to DOEE on a regular basis. The final walkthrough inspection with the DOEE inspector was conducted on December 21, 2017. The inspector approved the installations at each hot spot and the system was placed into operation.



**Project Name**

**Benning Stormwater Treatment System**

**Contech Jellyfish and Stormfilter Units**

| Hot Spot Areas    | Unit #  | Quantity (# of cartridges)<br>Installed | Location                | BMP Storage Volume (Cubic Feet) |
|-------------------|---------|-----------------------------------------|-------------------------|---------------------------------|
| <b>Hot Spot 1</b> |         |                                         |                         |                                 |
|                   | JF-I42  | 6                                       | Transformer Test Shop   | 64.00                           |
|                   | JF-I43  | 5                                       | Transformer Test Shop   | 64.00                           |
|                   | JF-I44  | 3                                       | Transformer Test Shop   | 32.00                           |
|                   | JF-1    | 10                                      | Transformer Test Shop   | 100.53                          |
|                   | SF-1    | 68                                      | Transformer Test Shop   | 1451.57                         |
|                   |         |                                         |                         |                                 |
| <b>Hot Spot 2</b> |         |                                         |                         |                                 |
|                   | JF-I66  | 5                                       | Salvage Yard            | 64.00                           |
|                   | JF-I68  | 5                                       | Salvage Yard            | 64.00                           |
|                   | SF-2    | 46                                      | Salvage Yard            | 444.00                          |
|                   |         |                                         |                         |                                 |
| <b>Hot Spot 3</b> |         |                                         |                         |                                 |
|                   | JF-3A   | 11                                      | Former Fuel Tank Area   | 100.53                          |
|                   | JF-3B   | 11                                      | Former Fuel Tank Area   | 100.53                          |
|                   | JF-I108 | 3                                       | Former Fuel Tank Area   | 32.00                           |
|                   | SF-3A   | 68                                      | Former Fuel Tank Area   | 660.00                          |
|                   | SF-3B   | 68                                      | Former Fuel Tank Area   | 660.00                          |
|                   |         |                                         |                         |                                 |
| <b>Hot Spot 4</b> |         |                                         |                         |                                 |
|                   | JF-4    | 9                                       | Former Power Plant Area | 100.53                          |
|                   | SF-4    | 56                                      | Former Power Plant Area | 482.00                          |
|                   |         |                                         |                         |                                 |
|                   |         |                                         |                         | <b>Total = 4419.69</b>          |

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

Stormwater Management Training

As shown on the attached lists, 73 employees working at Benning received the Stormwater Management Training during the prior quarter.

# FILTERS Selected

|          |                  |                   |
|----------|------------------|-------------------|
| <b>E</b> | Employee         |                   |
| <b>M</b> | Employee Status: | Active            |
| <b>P</b> | Company          |                   |
| <b>L</b> | Group            |                   |
| <b>O</b> | Division         |                   |
| <b>Y</b> | Department       |                   |
| <b>E</b> | Job Family       |                   |
| <b>E</b> | Work Location    | Kenilworth Office |

**\*\* Note: Report displays/counts only employee records with transcript history**

**REQUIREMENTS**

Requirement Storm Water Pollution Prevention Plan (CBT) (Active)

Requirement Status: Active

Training status: Completed

Frequency

Delivery Method

Date Range from 10/01/2017 to 12/31/2017

## Transcript List (by Employee)

**Pepco**  
Compliance Records Management System

| Employee                | EN    | Requirement Name                            | Frequency | Course Len | Del Method | Required by: | Date Completed |
|-------------------------|-------|---------------------------------------------|-----------|------------|------------|--------------|----------------|
| Axtell Jr, Steven M     | 15085 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/31/2017   | 12/31/2017     |
| Cohen, Matthew          | 11124 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 5/18/2018    | 12/22/2017     |
| Cox, Javon              | 15127 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/31/2017   | 12/31/2017     |
| Curran, Thomas J        | 14619 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/23/2017   | 12/6/2017      |
| Daniels, Dyguinni       | 14616 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/23/2017   | 12/6/2017      |
| Davis, Andre A          | 15104 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/31/2017   | 12/31/2017     |
| De Shazo Jr, William D  | 8959  | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 10/16/2017   | 10/15/2017     |
| Dimaggio III, Phillip P | 55762 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 5/5/2018     | 12/13/2017     |
| Douglas, Cody M         | 15086 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/31/2017   | 12/31/2017     |
| Estep, Robert S         | 15084 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/31/2017   | 12/31/2017     |
| Falkner, Eric C         | 10943 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/5/2017    | 12/1/2017      |
| Gaskins, Alphonzo       | 14617 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/23/2017   | 12/6/2017      |
| Goings, Ethan           | 15141 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/31/2017   | 12/31/2017     |
| Goodwin, Tracey T       | 15082 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/31/2017   | 12/31/2017     |
| Harris, Corey           | 15149 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 12/31/2017   | 12/31/2017     |
| Harrod, Lawrence        | 15034 | Storm Water Pollution Prevention Plan (CBT) | Yearly    | CBT        | CBT        | 11/30/2017   | 10/19/2017     |

# Transcript List (by Employee)

Pepco

Compliance Records Management System

| Employee                 | EIN   | Requirement Name                            | Frequency | Course Len | Del Method | Required by: | Date Completed |
|--------------------------|-------|---------------------------------------------|-----------|------------|------------|--------------|----------------|
| Hopkins, duJuan          | 15147 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Hughes, Keenan           | 15148 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Jennings-Phillips, Malik | 15173 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Jones, Timothy L         | 15095 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Kenner, Lisa D           | 15037 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 11/30/2017   | 10/19/2017     |
| Kerner, John             | 14622 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/23/2017   | 12/6/2017      |
| Khai Lon, John V         | 15098 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Kzesinski, Kacper        | 15099 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Lilly, Dante M           | 15139 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Martin, Michael C        | 57152 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/19/2017   | 12/23/2017     |
| Mcclain El, Antwoine D   | 15089 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Miller, Jameka           | 15119 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Mishou, Michael R        | 14623 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/23/2017   | 12/7/2017      |
| Pacheco, Christian E     | 14615 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/23/2017   | 12/6/2017      |
| Pecosh, Nicholas F       | 15091 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Rank, Robert K           | 56654 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 8/16/2017    | 10/10/2017     |
| Rank, Robert K           | 56654 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 10/10/2018   | 12/12/2017     |
| Sarres, Rodolfo A        | 15036 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 11/7/2017    | 11/7/2017      |
| Savoy, Garry S           | 15083 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Shenk, Jed S             | 14539 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Smith, Elijah J          | 15087 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Star, Benjamin M         | 11283 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/20/2017   | 12/20/2017     |
| Tilley, Benjamin C       | 14618 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/23/2017   | 12/8/2017      |
| Toney, Dalano            | 15140 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |

**Transcript List (by Employee)****Pepco****Compliance Records Management System**

| <i>Employee</i>             | <i>EIN</i>   | <i>Requirement Name</i>                            | <i>Frequency</i> | <i>Course Len</i> | <i>Del Method</i> | <i>Required by:</i> | <i>Date Completed</i> |
|-----------------------------|--------------|----------------------------------------------------|------------------|-------------------|-------------------|---------------------|-----------------------|
| <i>Totten, Thomas A</i>     | <i>15121</i> | <i>Storm Water Pollution Prevention Plan (CBT)</i> | <i>Yearly</i>    |                   | <i>CBT</i>        | <i>12/31/2017</i>   | <i>12/31/2017</i>     |
| <i>Wathen II, Jeffrey V</i> | <i>15006</i> | <i>Storm Water Pollution Prevention Plan (CBT)</i> | <i>Yearly</i>    |                   | <i>CBT</i>        | <i>10/4/2017</i>    | <i>10/4/2017</i>      |
| <i>Williams, James D</i>    | <i>15097</i> | <i>Storm Water Pollution Prevention Plan (CBT)</i> | <i>Yearly</i>    |                   | <i>CBT</i>        | <i>12/31/2017</i>   | <i>12/31/2017</i>     |
| <i>Willis Jr, Calvin M</i>  | <i>15088</i> | <i>Storm Water Pollution Prevention Plan (CBT)</i> | <i>Yearly</i>    |                   | <i>CBT</i>        | <i>12/31/2017</i>   | <i>12/31/2017</i>     |
| <i>Wursta, Stephen D</i>    | <i>55525</i> | <i>Storm Water Pollution Prevention Plan (CBT)</i> | <i>Yearly</i>    |                   | <i>CBT</i>        | <i>6/6/2018</i>     | <i>10/25/2017</i>     |

*Total # of employees that matched the selection criteria: 44**Total # of transcripts in this report: 45*



# **FILTERS Selected**

|                  |               |
|------------------|---------------|
| Employee         |               |
| Employee Status: | Active        |
| Company          |               |
| Group            |               |
| Division         |               |
| Department       |               |
| Job Family       |               |
| Work Location    | Benning (T&D) |

**\*\* Note: Report displays/counts only employee records with transcript history**

**REQUIREMENTS**

|                     |                                                      |
|---------------------|------------------------------------------------------|
| Requirement         | Storm Water Pollution Prevention Plan (CBT) (Active) |
| Requirement Status: | Active                                               |
| Training status:    | Completed                                            |
| Frequency           |                                                      |
| Delivery Method     |                                                      |
| Date Range from     | 10/01/2017 to 12/31/2017                             |

## **Transcript List (by Employee)**

**Pepco**  
Compliance Records Management System

| Employee               | EIN   | Requirement Name                            | Frequency | Course Len | Del Method | Required by: | Date Completed |
|------------------------|-------|---------------------------------------------|-----------|------------|------------|--------------|----------------|
| Abegaz, Tamrat D       | 15038 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Ayers, Jason O         | 12680 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 8/8/2017     | 10/16/2017     |
| David, Crisostomo M    | 14607 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/30/2017   | 11/28/2017     |
| Diggs, Michael E       | 15180 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Diop, El Hadj          | 15051 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Duperly, Heather       | 12308 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 7/15/2017    | 12/29/2017     |
| Fessahaie, Henok R     | 14939 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Fitzwater Jr, Walter P | 56437 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 11/21/2017   | 11/9/2017      |
| Ford, Tayvon M         | 15142 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Gautam, Arjun          | 15056 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Greathouse, Stephen W  | 15058 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Hall, Michael G        | 15196 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Hayden, Matthew        | 15177 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Iyoho, Aniefok         | 15183 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Johnson, Maurice       | 15192 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Kargbo, Abdulrahman D  | 15062 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |

# Transcript List (by Employee)

Pepco  
Compliance Records Management System

| Employee            | EN    | Requirement Name                            | Frequency | Course Len | Del Method | Required by: | Date Completed |
|---------------------|-------|---------------------------------------------|-----------|------------|------------|--------------|----------------|
| Keith, Joshua       | 14478 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Keyes III, William  | 15195 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Lawrence, TiYontie' | 15181 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Lee, Thomas R       | 15193 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Luke, Dylan         | 15185 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Macdonald, Paul     | 15143 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Maxwell, Richard    | 12767 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 9/20/2017    | 11/22/2017     |
| Okodaso, Mamie A    | 15059 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Wayson, Timothy M   | 15186 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Williams, Darrin J  | 15179 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |
| Young, Cornell      | 15175 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 12/31/2017   | 12/31/2017     |

Total # of employees that matched the selection criteria: 27

Total # of transcripts in this report: 27

# **FILTERS Selected**

|          |                  |                         |
|----------|------------------|-------------------------|
| <b>E</b> | Employee         |                         |
| <b>M</b> | Employee Status: | Active                  |
| <b>P</b> | Company          |                         |
| <b>L</b> | Group            |                         |
| <b>O</b> | Division         |                         |
| <b>Y</b> | Department       |                         |
| <b>E</b> | Job Family       |                         |
| <b>E</b> | Work Location    | Benning (Stores & Misc) |

**\*\* Note: Report displays/counts only employee records with transcript history**

**REQUIREMENTS**

|                     |                                                      |
|---------------------|------------------------------------------------------|
| Requirement         | Storm Water Pollution Prevention Plan (CBT) (Active) |
| Requirement Status: | Active                                               |
| Training status:    | Completed                                            |
| Frequency           |                                                      |
| Delivery Method     |                                                      |
| Date Range from     | 10/01/2017 to 12/31/2017                             |

## **Transcript List (by Employee)**

**Pepco**  
Compliance Records Management System

| Employee            | EIN   | Requirement Name                            | Frequency | Course Len | Del Method | Required by: | Date Completed |
|---------------------|-------|---------------------------------------------|-----------|------------|------------|--------------|----------------|
| Knight Jr, Joseph M | 61661 | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 11/29/2017   | 11/2/2017      |
| Moore, Terry        | 9185  | Storm Water Pollution Prevention Plan (CBT) | Yearly    |            | CBT        | 8/15/2017    | 10/5/2017      |

Total # of employees that matched the selection criteria: 2

Total # of transcripts in this report: 2



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

Stormwater Pollution Prevention Plan

The plan is currently being updated to include the construction of a new stormwater treatment system at the facility, and will be submitted to EPA with the next quarterly report.

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

Change in Management Responsibilities

There was no change in management responsibilities during the prior quarter.

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. See Pepco's July 31, 2017 quarterly reports to EPA.

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

Status of Stormwater Retention Project

Pepco and Princeton Hydro are scheduled to meet with DOEE on January 23, 2018 to review the 60% design (approved by EPA on August 31, 2017) and discuss DOEE's stormwater management permitting requirements. Princeton Hydro is currently working on utility clearance at the site and finalizing the design work in order to solicit bids for project construction. The project remains on schedule for completion by June 30, 2018 in accordance with Paragraph 54 of the Consent Decree.

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

Description of Non-Compliance

As reported to EPA on January 2, 2018, Pepco had planned to collect the fourth quarter 2017 stormwater samples in December, however, the samples could not be collected because there was no qualifying storm event in December. Pepco plans to collect make-up samples from the next qualifying storm event in 2018 and submit the results to EPA.