

Pepco Holdings 701 Ninth Street NW Washington, DC 20068-0001 202 872 2000 pepcoholdings com

VIA Electronic mail and US Mail

January 31, 2020

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

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

Dear Ms. Hopkins,

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

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

The certification statement signed by the Vice President of Support Services is also attached. Please contact me at 412-400-7216 or tammy.sanford@exeloncorp.com, if you have any questions or need additional information.

Sincerely,

Jammy O. Sangach Tammy Sanford

Manager, Environmental Management

Attachments



An Exelon Company

CERTIFICATION STATEMENT

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Michael S. Poncia,

Vice President, Support Services

1/29/2020

Signature

Date

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

Discharge Monitoring Reports

Copies of DMRs for October - December 2019 are attached.

DMR Copy of Record

Permit															
Permit #:	DC0000094			Permittee	toe:		PEP	PEPCO Environment Management Services	rices	<u>=</u>	Facility	PEPCO - BENNING	NING		
Major	Yes			Permit	Permittee Address:		701 WAS	701 Ninth Street, NW, Room 6219 WASHINGTON, DC 20019		<u></u>	Facility Location:	3300 BENNIN WASHINGTO	3300 BENNING ROAD, N.E. WASHINGTON, DC 20019		
Permitted Feature:	013 External Outfall			Discharge:	:eå:		BNON	013-A BNON COOLING WATER BLOWDOWN	7						
Report Dates & Status															
Monitoring Period:	From 09/01/19 to 10/31/19	131/19		DMR	DMR Due Date:		11/2	11/28/19		en_	Status:	NetDMR Validated	dated		
Considerations for Form Completion	pletion														
Principal Executive Officer															
First Name:	William			Title:			8	VP, Operations		-	Telephone:	202-872-2942			
Last Name:	Sullivan			9											
No Data Indicator (NODI)															
Form NODI:															
Parameter	Monitoring Beason	Persm.			Quantity or Loading	Loading			Quality or Concentration	entration			# of Frequen	Frequency of Analysis	Sample
Code Name	Location	NODI	8	Quelifier Value 1	e 1 Chaliffer	er Value 2	Units	s Qualifier Value Qualifier	Value 2	Qualifier 3	Value 3	Units	ai ai		Type
		20	Bample	0 001394	п	0.108	MGD .						Months	01/60 - Once Every 2 E	ESTIMA
50050 Flow, in conduit or thru treatment	1 - Effluent Grose 0	1	Permit Req.	Req Man MO AVG	МО	Req Mon DAILY MX	LY 03 -						01/80 - On Months	01/80 - Once Every 2 E Months	ESTIMA
		> 2	Value												
		200	Sample												
TS000Toxicity, Acute	1 - Effluent Grass 0	£ "	Permit Req.					Opt Men DAILY AV	ALY AV	Opt N	Opt Mon DAILY MX	2F - tox acuts	01/5Y - On Years	01/5Y - Once Every 5 2 Years	24 - COMP24
		> 2	Value					9 - Condition	9 - Conditional Monitoring - Not Required This Period	9 C	9 - Conditional Monitoring - Not Required This Period				

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

HTD/S,

No errors.

Submission Note

Toxicity Acute sampling requirement was met in compilance with the permit condition, therefore, no further sampling was conducted.

Attachmonts

No attachments. Report Last Saved By

Report Last Saved By PEPCO Environment Management Services

 User:
 HIEDISTURM

 Name:
 Hiedi Sturm

 E-Malt
 hiedi sturm@exeloncorp.com

Report Last Signed By User

Date/Time:

Date/Time:

Hiedi Sturm
hiedi.sturm@exelonc.orn
2019-11-25 07:37 (Time Zone:-05:00)

HIEDISTURM

2019-11-14 12:51 (Time Zone: -05:00)

Permit ID: Permittee: DC0000094

Major:

Discharge:

Permittee Address:

701 Ninth Street, NW, Room 6219 WASHINGTON, DC20019

3300 BENNING ROAD, N.E.

Facility: PEPCO - BENNING Facility Location:

WASHINGTON, DC20019 013-A - BNON COOLING WATER BLOWDOWN

Report Dates & Status

Monitoring Period: From 11/01/19 to 12/31/19

Permitted Feature: 013 - External Outfall

DMR Due Date: NetDMR Validated

01/28/20

Considerations for Form Completion

Principal Executive Officer

First Name: Title:

VP, Operations

Last Name:

Telephone:

Sullivan

PEPCO Environment Management Services

202-872-2942

No Data Indicator (NODI)

Form NODI:

Par	rameter	NODI	Quan	tity or Loading			Quality or Conce	entration		#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis	Type
50050	Flow, in condult or thru treatment plant	Smpl.	=0.00331	=0.033	03 = MGD						01/60 - Once Every 2 Months	ES = ESTIMA
1 - Effli	ient Gross											
Season	0	Req	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD						01/60 - Once Every 2 Months	ES - ESTIMA
NODI		NODI										
TS000	Toxicity, Acute	Smpl.										
1 - Efflu	uent Gross											
Season	. 0	Req.					Opt Mon DAILY AV	Opt Mon DAILY MX	2F tox acute		01/5Y = Once Every 5 Years	24 COMP24
NODI	•	NODI					9 - Conditional Monitoring - Not Required This Period	9 - Conditional Monitoring - Not Required This Period				

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 previously met in compliance with the permit condition, therefore, no further sampling was conducted

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

HIEDISTURM User: Hied Sturm Name:

E-Mail: hiedi.sturm@exeloncorp.com

2020-01-28 08:55 (Time Zone:-05:00) Date/Time:

Report Last Signed By

HIEDISTURM User: Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 15:40 (Time Zone:-05:00)

Permit ID: DC0000094

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

Discharge: 013-Q - No Blowdown

Report Dates & Status

Permitted Feature:

Monitoring Period: From 10/01/19 to 12/31/19 DMR Due Date: 01/28/20

Status: NetDMR Validated

013 - External Outfall

Considerations for Form Completion

NO BLOWDOWN

Principal Executive Officer

First Name: William Last Name: Sullivan

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

No Data Indicator (NODI)

Form NODI:

Parameter NOD1 Quantity or Loading Quality or Concentration # Freq. of Smpl.

Code Name Value 1 Value 2 Units Value 1 Value 2 Value 3 Units Ex.

Par	ameter	NODI	Quantity	or Loading			Quality or Conce	ntration		#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis	Туре
00400	pH ent Gross	Smpl.				=6.17		=7.66	12 - SU		01/90 - Quarterly	GR - GRAB
Season		Req.				>=6 0 MINIMUM		<=8.5 MAXIMUM	12 -		01/90 -	GR =
NODI: -		NODI				325.5		The sign of the si	SU		Quarterly	GRAB
00530		Smpl.					=7.2	=7.2	19 -		01/90 -	GR -
1 - Efflu	ent Gross							- · ·	mg/L		Quarterly	GRAB
Season:	0	Req.					<=30.0 MQ AVG	<=100.0 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00556	Grease	Smpl.					< 5.38	<5.38	19 - mg/L		01/90 - Quarterly	GR - GRAB
1 - Efflu	ent Gross											
Season:		Req.					Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
	Cadmlum,	NODI										
	total (as Cd)	Smpl.					<0.25	< 0.25	28 - ug/L		01/90 Quarterly	GR - GRAB
1 - 21111	ent Gross						<=2.08 MO	<=4.95 DAILY	28 -		04/00	CD
Season	0	Req.					AVG	MX	ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01042	Copper, total (as Cu)	Smpl.					=1.1	=1.1	28 - ug/L		01/90 - Quarterly	GR - GRAB
1 - Efflu	ent Gross											
Season:	0	Req.					<=5.24 MO AVG	<=13.44 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
	Iron, total (as Fe) ent Gross	Smpl.					=0.6	=0.6	19 - mg/L		01/90 - Quarterly	GR - GRAB
Season:	0	Req.					<=0.69 MO AVG	<=1.0 DAILY MX	19 · mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
	Lead, total [as Pb]	Smpl.					<1.0	<1,0	28 - ug/L		01/90 - Quarterly	GR - GRAB
1 - Efflu	ent Gross						. 55.5.110					
Season: NODI:		Req.					<=56.6 MO AVG	<=64.58 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
		NODI										
01092	Zinc, total [as Zn] ent Gross	Smpl.					=79.4	=79.4	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season:		Dag					<=73.11 MO	<=117.18 DAILY	28 -		01/90 -	GR -
NODI:		Req.					AVG	MX	ug/L		Quarterly	
	PCB=1242	NODI										
	ent Gross	Smpl.						0.0	28 - ug/L			GR - GRAB
Season:	0	Req.						<=1.0 DAILY MX	28 - ug/L		01/90 = Quarterly	GR - GRAB
NODI: -		NODI									•	
	PCB 1254 ent Gross	Smpl.						=0,0	28 - ug/L			GR - GRAB
Season:		Req.						<=1.0 DAILY MX	28 - ug/L		01/90 -	GR - GRAB

Parameter	NODI	Quanti	ity or Loading			Quality or Conc	entration		# of	Freq. of Analysis	Smpl.
Code Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units		Milalysis	Туре
NODI: -	NODI										
39508 PCB-1260 1 - Effluent Gross	Smpl.						=0.0	28 - ug/L		01/90 - Quarterly	GR • GRAB
Season: 0	Req.						<=1.0 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI										

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

P	arameter	Monitoring	Finial	7	Mananiakia n	A =1.= = = d = =
Code	Name	Location	Field	Түре	Description	Acknowledge
01092	Zinc, total [as Zn]	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	√

Comments

Zn was sampled via grab sample on 11/18/2019 and analyzed twice Original 0.0816 ppm / 2nd 0.0771 ppm average of results 0.0794 ppm was reported. Zn was also collected via ISCO Auto Sampler on 11/25/2019 using the sampling protocol that was submitted to EPA on December 20, 2019. The result was .0611 ppm but was not included in the November monthly average because the protocol has not yet been approved by EPA. Zn was also sampled via grab sample on 12/29/2019 with a result of 0.0683 ppm

Attachments

Name	Туре	Size
2019 O4 Outfall 013 NPDES Storm Event and TMDL Reductions.odf	pdf	76990.0

Report Last Saved By

PEPCO Environment Management Services

User: HIEDISTURM
Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 15:37 (Time Zone:-05:00)

Report Last Signed By

User: HIEDISTURM
Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 15:40 (Time Zone:-05:00)

Attachment 1

NPDES Permit DC 0000094

Permit Condition Part II. A

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

	Storm Eve	nt Monitoring Red	quirements	
Outfall	Sample Date	Duration of Storm Event	Rainfall Measurement	Duration Between Measurable
Number		(in hours)	(in inches)	Storm Events (hours)
013	11/18/2019	7	0.33	426
013	12/29/2019	20	0.68	277

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction Calculations for the November 18, 2019 (All parameters including re-analysis of Zinc) and the December 29, 2019 sampling just for zinc at Outfall 013.

Benning Generating Station Pollutant Load Percent Reduction Washington, DC

Outfall	Parameter	Sample Dates	Average Concentration (mg/L) (a) ⁽¹¹⁾	Average Flow (cfs) ⁽²⁾	Load (mg/s)	Maximum Daily Limit (mg/L) (c)	Maximum Daily Stormwater Discharge Concentrations Goals for Metals (b)	Baseline Concentration (mg/L)		Source of Baseline Concentration ⁽¹⁰⁾	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ⁽⁷⁾	Pollutant Concentration Reduction Compared with Baseline Concentration ⁽⁸⁾	Pollutant Load Concentration Compared with Baseline Load ⁽⁸⁾
013Q	TSS	11/18/2019	7.2	1.16	236.50	100	100	42	(b) Highest TSS discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005	Highest TSS discharge concentration from DMR data. Quarterly stormwater DMR data for Oct-Dec 2010. TSS was not reported on DMRs prior to Jul-Sep 2009. Flow was measured in October 2010.	4.82	5732	93%	83%	96%
013Q	Cadmium	11/18/2019	<0.000250	1.16	0.0 (1)	0.00495	0.0045	0.00075	(b) Reasonable potential analysis concentration for cadmium	Highest cadmium discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jan-Mar 2006.	7.48	0.16	100%	100%	100%
013Q	Copper	11/18/2019	0.0011	1.16	0.04	0.01344	0.0134	0.064	(b) Highest copper discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2006	Highest copper discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2006.	3.14	5.7	92%	98%	99%
013Q	Iron	11/18/2019	0.6	1.16	19.71	1.00	NA	5.80	(f) Highest iron discharge concentration from DRM data for Outfall 013Q. Quarterly Stormwater DMR Data for Jul-Sep 2007.	Highest iron discharge concentration from DMR data for Outfall 013Q. Quarterly Stormwater DMR Data for Jul-Sep 2007.	0.148	24	40%	90%	19%
013Q	Nickel	No Sample		1.16		0.117 ⁽⁵⁾	0.117	0.056	(b) Reasonable potential analysis concentration for nicke	Highest nickel discharge concentration from DMR data for Outfall 013Q. Quarterly Stormwater DMR Data for Jul-Sep 2007.	0.148	0.23			
013Q	Lead	11/18/2019	<00010	1.16	0.0 (1)	0.06458	0.0645	0.023	(f) Highest lead discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data forJan- Mar 2006	Highest lead discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data forJan-Mar 2006.	7.48	4.9	100%	100%	100%
013Q	Zinc	11/18/2019	0.0794	1.16	2.6	0.11718	0.117	0.9	(b) Highest zinc discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005	Highest zinc discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005.	5.15	131	32%	91%	98%
013Q	Zinc	12/30/2019	0.0683	0.84	1.6	0.11718	0.117	0.9	(b) Highest zinc discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005	Highest zinc discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005.	5.15	131	42%	92%	99%
013Q	PCB-1242	11/18/2019	<0.000500	1.16	0.0 ⁽¹⁾	No Discharge	NA	0		Quarterly DMRs for Outfall 013Q. PCB Aroclors were not detect from 2005 to 2010.	NA ⁽⁹⁾	0(9)	0%	0% ⁽³⁾	0% ⁽³⁾
013Q	PCB-1254	11/18/2019	<0.000500	1.16	0.0 ⁽¹⁾	No Discharge	NA	0		Quarterly DMRs for Outfall 013Q. PCB Aroclors were not detect from 2005 to 2010.	NA ⁽⁹⁾	0 ⁽⁹⁾	0%	0% ⁽³⁾	0% ⁽³⁾
013Q	PCB-1260	11/18/2019	<0.000500	1.16	0.0 ⁽¹⁾	No Discharge	NA	0		Quarterly DMRs for Outfall 013Q. PCB Aroclors were not detect from 2005 to 2010.	NA ⁽⁹⁾	O ⁽⁹⁾	0%	0% ⁽³⁾	0% ⁽³⁾
Manhole K	TSS	11/22/2019	50	0.19	269	Monitor Only	NA	41		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	259	NA	-22%	-4%
Manhole K	Cadmium	11/22/2019	<0.00125	0.19	0.0 ⁽¹⁾	0.0045 ⁽⁶⁾	0.0075	0.0012		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	0.0076	100%	100%	100%
Manhole K	Copper	11/22/2019	0.0521	0.19	0.280	0.0134 ⁽⁶⁾	0.0134	0.093		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	0.59	-289%	44%	52%
Manhole K	Iron	11/22/2019	4.1	0.19	22.1	Monitor Only	NA	3.8		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	24	-853%	-8%	8%
Manhole K	Nickel	11/22/2019	0.0342	0.19	0.184	0.117 ⁽⁶⁾	0.117	0.09		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ . Flow was measured in September 2011.	0.223	0.57	71%	62%	68%
Manhole K	Lead	11/22/2019	0.0454	0.19	0.244	0.0645 ⁽⁶⁾	0.0645	0.13		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	0.82	30%	65%	70%
Manhole K	Zinc	11/22/2019	0.124	0.19	0.67	0.117 ⁽⁶⁾	0.117	0.57		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	3.6	-6%	78%	81%
Manhole K	PCB-1242	11/22/2019	<0.000500	0.19	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ . Flow was measured in September 2011.	0.223	0 ₍₉₎	NA	0% ⁽³⁾	0% ⁽³⁾
Manhole K	PCB-1254	11/22/2019	<0.000500	0.19	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾		Third Quarter 2011 DMR for Manhole K ^{(4).} Flow was measured in September 2011.	0.223	0 ⁽⁹⁾	NA	0% ⁽³⁾	0% ⁽³⁾
Manhole K	PCB-1260	11/22/2019	<0.000500	0.19	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	0(9)	NA	0% ⁽³⁾	0% ⁽³⁾

Sources:

(a) Microbac, 2019 Fourth Quarter Sample Analytical Results Microbac Laboratories, Inc.

(b) USEPA, 2009a. Authorization to Discharge Under the National Pollutant Discharge Elimination System Industrial Permit Number: DC0000094. United States Environmental Protection Agency. Effective July 19, 2009. (c) Maximum Daily Limit listed in the 2009 NPDES Permit

Notes:

cfs - cubic feet per second mg/L - milligrams per NA - Not applicable NS - Not sampled

mg/L - milligrams per liter mg/s - milligrams per second

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

Prepared by: EFT 10/24/2019

⁽²⁾ Flow was calculated using using November 18th and December 30th (Outfall 013) and November 22nd (Manhole K) rainfall and site data.

⁽³⁾ Not required by 2009 NPDES Permit for Benning Generating Station.
(4) Data from the September 5, 2011 sampling event for Manhole K was established as the ba

⁽⁴⁾ Data from the September 5, 2011 sampling event for Manhole K was established as the baseline load because it was the first sample collected after Manhole K was retrofitted. The retrofit was performed so that a representative

sample could be collected from Manhole K. Flow was estimated based on the storm intensity and catchment area.

⁽⁵⁾ No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentrations Goals for Metals listed in Section VIII.E of the 2009 NPDES Permit for Benning Generating Station.

⁽⁶⁾ Manhole K has no maximum daily limit for the constituent and is monitoring only. Value listed is the Maximum Daily Stormwater Discharge Concentrations Goals for Metals listed in Section VIII.E of the 2009 NPDES Permit for Benning Generating Station.

⁽⁷⁾ Positive values indicates that the June 2019 concentrations are lower than the maximum daily limit for the pollutants.

⁽⁸⁾ Positive values indicate that the June 2019 concentrations/loads are lower than the baseline concentrations/loads.

⁽⁹⁾ There were no detections of PCB Aroclors. Therefore, a baseline flow was not established. However, given that the concentration of PCB Aroclors is zero, the load is also zero regardless of flow.

Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 013Q from 2005 to 2007. TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2009 to 2010 DMRs for Outfall 013Q.

⁽¹¹⁾ November 18th zinc data is an average of the original analysis and re-analysis of the original sample

DMR Copy of Record

Lange													
Permit #:	DC0000094		Permittee:	ë	PEPCO Environn	PEPCO Environment Management Services	Services		Facility:		PEPCO-	PEPCO - BENNING	
Major:	Yes		Permitte	Permittee Address:	701 Ninth Street, WASHINGTON,	701 Ninth Street, NW, Room 6219 WASHINGTON, DC 20019			Facility Location:	ocation:	3300 BEN WASHIN	3300 BENNING ROAD, N.E. WASHINGTON, DC 20019	
Permitted Feature:	603 External Outfall		Discharge:	:85	003-A OIL/WATER SEPARATOR	PARATOR							
Report Dates & Status	Emm 1001/10 to 10/71/10		Date Due Date:	- Dute.	44730740						0	Mark the state of	
Considerations for Form Completion	etion								Commen		Medical	Mail Day American	
PCBS WILL USE ANALY MET.608 Principal Executive Officer	8												
First Name:	William		Title:		VP. Operations				Telephone:		202-872-2942	2942	
Last Name:	Sullivan												
No Data Indicator (NODI)													The same of
Form NODI:													
Parameter Code Name	Monitoring Location Season # Param. NODR	n # Param. NOOR		Qualifier 1 Value 1 Q	Quantity or Loading Quatifier 2 Value 2	Units Qualifie	Units Qualifler1 Value1 Quel	Qualifier 2 Value 2 Que	oncentration s 2 Quelifier 3	r 3 Value 3	# of I	# of Ex. Frequency of Analysis Sam	Sample Type
_	1 - Effluent Gross 0	1	99			¥				8 5 MAXIMUM	12 - SU	01/DS - Once Per Discharge GR - GRAB	GRAB
OMEO Collide bothel secondaried			Sample				C - No Discharge			C - No Discharge			
מקייקים לתנופה שתפו שמנות	o and a second		Value NODI				9	C - No Discharge	charge	C - No Discharge	19 - mg/L	UTUS - Once Per Decharge GR - GRAB	GRAB
00556 Oil & Gresse	1 - Effluent Gross 0	1	Permit Req.				V	15 MO AVG C - No Discharge	G ce	20 DAILY MX C - No Discharge	19 - mg/L	01/DS - Once Per Discharge GR - GRAB	GRAB
38496 PCB-1242	1 - Effluent Grass 0	1	Permit Req.						t	1 DAILY MX C - No Discharge	28 - ug/L	01/DS - Once Per Decharge GR - GRAB	GRAB
38504 PCB-1254	1 - Effluent Gross 0		Parmit Req. Value NODI							1 DAILY MX C - No Discharge	28 - ug/L	01/DS - Once Per Discharge GR - GRAB	GRAB
39508 PCB-1260	1 - Effluent Gross 0	-1	Sample Permit Req. Vatue NODI							1 DAILY MX C - No Discharge	28 - ug/L	01/DS - Once Per Discharge GR - GRAB	GRAB
50050 Flow, in conduit or thru treatment plant 1 - Effluent Gross	ant 1 - Effluent Gross 0	1	Bample Permit Req. Value NODI	Req Mon MO AVG	Req Mon DAILY MX 03 - MGD C - No Discharbe	MX 03 - MGD		Req Mon MO AVG	10 AVG	Req Mon DAILY MX 03 - MGD	IX 03 - MGD	01/DS - Once Per Discharge MS - MEASRD	MEASRD
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.	n any values for the Sample	nor Effluent Tr	ading, then no.	ne of the following field	s will be submitted for	that row: Units, Nu	mber of Excursions, F	requency of A	nalysis, and Se	Imple Type			
No errors.													
Michigan Company													
No ettechnicis													
Report Last Saved By													
PEPCO Environment Management Services	int Services												
User		HEDISTURM											
Name:		Fledi Sturm hiedi sturm@exeloncom.com	aloncom com										
Date/Time:		1019-11-14 08	2019-11-14 08:59 (Time Zone: -05:00)	e: -05:00)									
Report Last Signed By													
User		HIEDISTURM											
Name		Hiedi Sturm											
E-Mail:		hiedi.stum@exeloncorp.com	eloncorp.com										
Date/Time:		:019-11-25 D.C	2019-11-25 07:37 (Time Zone: -05:00)	e: -05:00)	90. POSSESSEE		PERSONAL PROPERTY.						

Permit ID:

DC0000094

Мајог:

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:

Report Dates & Status

003 - External Outfall

Discharge:

003-A - OIL/WATER SEPARATOR

Monitoring Period: Status:

From 11/01/19 to 11/30/19

NetDMR Validated

DMR Due Date:

12/28/19

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name:

William

VP, Operations

Last Name: Telephone: Sullivan

202-872-2942

No Data Indicator (NODI)

Form NODI:

Title:

Code

Parameter Name NODI

Quantity or Loading

Value 2 Units

Value 1

Quality or Concentration Value 2

Value 3

of Units Ex. Freq. of Analysis

Smpl. Type

https://netdmr.epa.gov/netdmr/protected/sign_submit_dmr.htm?_flowId=permitadmin_ac... 12/16/2019

Parameter	NODI	Quant	tity or Loading			Quality or Conce	entration		#	Freq. of	Smpl.	
Code Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of	Analysis	Туре	
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	Smpl.											
1 - Effluent Gross												
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 OII & Grease	Smpl.											
1 - Effluent Gross												
Season: 0	Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB	
NODI: -	NODI					C - No Discharge	C - No Discharge					
39496 PCB-1242	Smpl.											
1 - Effluent Gross												
Season: 0	Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB	
NODI: -	NODI						C - No Discharge					
39504 PCB-1254	Smpl.											
1 - Effluent Gross	Jilipii											
Season: 0	Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB	
NODI: -	NODI						C - No Discharge					
39508 PCB-1260	Smpl.											
1 - Effluent Gross	Jilipii											
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	Smpl.											
plant 1 - Effluent Gross	2p.											
S EGent Gross		L								01/DS -		
Season: 0	Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Once Per Discharge	MS - MEASRD	
NODI: -	NODI	C - No Discharge	C - No Discharge			C - No Discharge	C - No Discharge					

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:

HIEDISTURM

Name:

Hiedi Sturm

E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2019-12-05 11:34 (Time Zone:-05:00)

Report Last Signed By

User:

HIEDISTURM

Name:

Hiedi Sturm

E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2019-12-16 14:47 (Time Zone:-05:00)

Status:

Title:

Permit ID: DC0000094

Permittee: PEPCO Environment Management Services

NetDMR Validated

Permittee Address:

701 Ninth Street, NW, Room 6219 WASHINGTON , DC20019

Facility: PEPCO - BENNING

3300 BENNING ROAD, N.E. Facility Location:

WASHINGTON , DC20019

Permitted Feature: 003 - External Outfall

Discharge:

Major:

003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 12/01/19 to 12/31/19 DMR Due Date:

01/28/20

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name:

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

No Data Indicator (NODI)

Form NODI:

Parameter NODI Quantity or Loading Quality or Concentration

Units Ex.

Freq. of

Code Name

Value 1

Value 2

Units Value 1 Value 2

Value 3

of Analysis

Smpl.

March Marc	Par	ameter	NODI	Quani	tity or Loading			Quality or Conce	entration		#	Freq. of	Smpl.
Definion Control Con	Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units		Allalysis	Type
- Efficient Gross Req.	00400	рΗ											
Season: 0 Req. Season: 0	1 - Efflu	ent Gross	Smpl.										
Season: 0 Req. Season: 0												M1/DS -	
NODI	Season	0	Req.				>=6.0 MINIMUM		<=8.5 MAXIMUM			Once Per	
Discharge Discharge Discharge C - No Discharge C - No Discharge C - No Discharge Dischar												Discharge	
Selidis Smiphed Smpl.	NODI: -		NODI						C - No Discharge				
1 - Effluent Gross	00530	Solide											
Season: 0 Req. Re	00550	total											
Season: D Req.		suspenaea	Smpi.										
NOD - NOD NOD C - NO Discharge C - NO Di	1 - Efflu	ient Gross											
NODI	Sarran	- n	Bee					<=30.0 MO	<=100.0 DAILY	19 -			GR -
Discharge C - No Discharge	3603011		req					AVG	MX	mg/L			GRAB
Discharge Smpl.	NODI		NODE					C - No	C. No Glockson				
Crease Smpl.	MODI,		NODI					Discharge	C - No Discharge				
Season: 0 Req. Req Mon MO Req Mon DAILY MGD Req Mon DAILY MGD Season: 0 Req. Req Mon MO Req Mon DAILY MGD Season: 0 Req. Req Mon MO Req Mon DAILY MGD Season: 0 Req. Req Mon MO Req Mon DAILY MGD Season: 0 Req. Req Mon MO Req Mon DAILY MGD Season: 0 Season: 0 Req. Req Mon MO Req Mon DAILY MGD Req Mon DAILY MGD Season: 0 Season: 0 Req. Req Mon MO Req Mon DAILY MGD Season: 0 Season: 0 Req. Req Mon MO Req Mon DAILY MGD Req Mon MO Season: 0 Season: 0 Req. Req Mon MO Req Mon DAILY MGD Req Mon MO Season: 0 Season: 0 Season: 0 Req. Req Mon MO Req Mon DAILY MGD Season: 0 Season: 0 Season: 0 Season: 0 Season: 0 Season: 0 Req. Req Mon MO Req Mon DAILY MGD Season: 0 Seas	00556												
Season: 0 Req.			Smpl.										
NODI	1 - Emili	ient Gross											
NODI: NODI NODI: Smpl. Season: 0 Req. NODI: NODI Season: 0 NODI Season: 0 Req. NODI: NODI Season: 0 Req. NODI: NODI Season: 0 Req. NODI: NODI Season: 0 NODI Season: 0 Req. NODI: NODI Season: 0 NODI	Season	0	Rea.										
NODI			(5.00) TO (5.00)					AVG	MX	mg/L			GRAB
39496 PCB-1242 1 - Effluent Gross Smpl. Smpl. Season: 0 Req.	NODI:		NODI						C - No Discharge				
Season: 0 Req.								Discharge	c no bischarge				
Season: 0 Req.	39496	PCB-1242	Smpl.										
Season: 0 Req.	1 - Efflu	ient Gross											
NODI: - NODI	C	. 0								28 -			GR -
39504 PCB-1254 1 - Effluent Gross	Season	U	Req.						<=1.0 DAILY MX				
39504 PCB-1254 1 - Effluent Gross	NODI: -		NODI						C - No Discharge				
Season: 0 Req. Re	39504	PCR-1254											
Season: 0 Req.			Smpl.										
Season: 0 Req.	1 - 61110	ient Gross											
NODI: - NODI Smpl. Season: 0 Req. NODI NODI: - NODI Season: 0 Req. NODI NODI: - NODI	Season	. 0	Req.						<=1.0 DATLY MX				
39508 PCB-1260 1 - Effluent Gross Season: 0 Req.										ug/L			GRAB
Season: 0 Req. <=1.0 DAILY MX 28 - Ug/L Once Per GRAB NODI: NODI South of thrust treatment plant 1 - Effluent Gross Season: 0 Req. Req Mon MO Req Mon DAILY 03 - MGD AVG MX MX MGD Once Per GRAB NODI: - NODI C - No Discharge O1/DS - Once Per GRAB O1/DS - Once Per MS - Once Per Discharge	NODI: -		NODI						C - No Discharge				
Season: 0 Req.	39508	PCB-1260											
Season: 0 Req.	1 - Efflu	ent Gross	Smpi.										
Season: 0 Req.										20 0		01/DS -	-
NODI: NODI C - No Discharge	Season	: 0	Req.						<=1.0 DAILY MX			Once Per	
50050 Flow, In conduit or thru treatment plant 1 - Effluent Gross Season: 0 Req. Req Mon MO Req Mon DAILY 03 - MGD Req Mon DAILY 03 - Once Per MS - Once P	NODI		NOOT						C 11 Divis			Distillarge	
conduit or thru treatment Smpl. plant 1 - Effluent Gross Season: 0 Req. Req Mon MO Req Mon DAILY 03 - MGD AVG MX MGD AVG MX MGD AVG MX MGD MEASRD NODL: - NOD C - No Discharge			MODI						C - NO DISCHARGE				
treatment plant 1 - Effluent Gross Season: 0 Req. Req Mon MO Req Mon DAILY 03 - Req Mon DAILY 03 - MGD AVG MX MGD AVG MX MGD AVG MX MGD Once Per Discharge NODE: - NO C No Discharge	50050												
plant 1 - Effluent Gross Season: 0 Req. Req Mon MO Req Mon DAILY 03 - MGD Req Mon DAILY 03 - Once Per Discharge NODE: - NO C			Smol										
Season: 0 Req. Req Mon MO Req Mon DAILY 03 - Req Mon MO Req Mon DAILY 03 - Once Per MS			Jiip.i										
Season: 0 Req. AVG MX MGD AVG MX MGD Once Per Discharge MEASRD	1 - Efflu	ent Gross											
Season: 0 Req. AVG MX MGD AVG MX MGD Once Per Discharge MEASRD				Dog Mar MO	Pag Man DATIV	03		Peo Mac MO	Don Man DARLY	02		01/DS -	мс
NODE C-NO C-NO C-NO Discharge	Season	0	Req.									Once Per	
				C. No.	C - No			C No.				Discharge	
	NODI: -		NODI						C - No Discharge				

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: HIEDISTURM
Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-21 11:26 (Time Zone:-05:00)

Report Last Signed By

User: HIEDISTURM
Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 15:40 (Time Zone:-05:00)

Permit ID: DC0000094 Major:

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

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

201-A - INTERNAL MONITORING PT- 201 Permitted Feature: 201 - External Outfall Discharge:

Report Dates & Status

Monitoring Period: From 10/01/19 to 12/31/19 DMR Due Date: 01/31/20

Status: NetDMR Validated

Considerations for Form Completion

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

FIRESIDEWASHING

Principal Executive Officer

First Name: Last Name: Sullivan

VP, Operations Telephone: 202-872-2942

No Data Indicator (NODI) Form NODI:

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

https://netdmr.epa.gov/netdmr/protected/search_dmr.htm?_flowId=permitadmin_access_re... 1/29/2020

Pa	rameter	NODI	Quan	tity or Loading			Quality or Conce	entration		#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis	Type
00400 1 - Effl	pH uent Gross	Smpl.				=8.03		=8.03	12 - SU		01/90 - Quarterly	GR - GRAB
Season	: 0	Req.				>=6.0 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NOD1:		NODI										
00530	Solids, total suspended	Smpl.					=9.0	=9.0	19 - mg/L		01/90 - Quarterly	GR - GRAB
1 - Effi	uent Gross											
Season	ı: 0	Req.					<=30.0 MO AVG	<=100.0 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NOD1:	5 3	NODI										
00556 1 - Effi	Oil & Grease Lent Gross	Smpl.					<5.26	<5.26	19 - mg/L		01/90 - Quarterly	GR - GRAB
Season	: 0	Req.					<=10.0 MO AVG	<=15.0 DAILY	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI:		NODI							-,0,00			
	PCB-1242 uent Gross	Smpl.						0,0	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season	: 0	Req.						<=1.0 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI:	- 1	NODI							- 37 -			
	PCB-1254 uent Gross	Smpl.						=0,0=	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season	: 0	Req.						<=1.0 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI:	-	NODI										
	PCB-1260 uent Gross	Smpl.						·· 0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season	: 0	Req.						<=1.0 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NOD1:	•	NODI										
X 50050	Flow, in conduit or thru treatment plant	Smpl.	=0.005566	=0.108	03 - MGD						01/90 - Quarterly	ES - ESTIMA
1 - Effi	uent Gross											
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										

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

Edit Check Errors

	Parameter	Monitoring	Field	T	Dannighta -	A al	
Code	Name	Location	rield	Type	Description	Acknowledge	
50050	Flow, in conduit or thru treatment plant	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The permit limit value does not have a sample value or NODI selection. (Error Code: 1)	4	
50050	Flow, in conduit or thru treatment plant	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The permit limit value does not have a sample value or NODI selection. (Error Code: 1)	~	

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

HIEDISTURM

Name:

Hiedi Sturm

E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2020-01-22 13:12 (Time Zone:-05:00)

Report Last Signed By

User:

HIEDISTURM Hiedi Sturm

Name: E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2020-01-28 15:40 (Time Zone:-05:00)

Permit ID:

DC0000094

Major:

Permittee:

PEPCO Environment Management Services

Permittee Address: Facility Location:

701 Ninth Street, NW, Room 6219 WASHINGTON, DC20019

Facility:

PEPCO - BENNING

3300 BENNING ROAD, N.E.

WASHINGTON, DC20019 201-B - HYDROSTATIC TESTING TANKS

Permitted Feature: Report Dates & Status

Monitoring Period: From 10/01/19 to 12/31/19

201 - External Outfall

DMR Due Date:

Discharge:

01/31/20

NetDMR Validated Status:

Considerations for Form Completion

Principal Executive Officer

First Name: William

Last Name:

Sullivan

Title:

VP, Operations

Telephone:

202-872-2942

No Data Indicator (NODI)

Form NODI:

Parameter NODI Quantity or Loading

Quality or Concentration

of

Freq. of Analysis

Code Name

Value 1 Value 2

Units Value 1 Value 2

Value 3

Units Ex.

Smpl. Type

Pa	rameter	NODI	Quantity	or Loading			Quality or Conce	ntration		#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis	Type
00310	BOD, 5-day, 20 deg. C	Smpl.										
1 - Eff	uent Gross											
Seasor	n: 0	Req.					<=30.0 MO AVG	<=60.0 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI:		NODI					2 - Operation Shutdown	2 - Operation Shutdown				
00400	pH uent Gross	Smpl.										
											01/DS -	
Seasor	1: 0	Req.				>=6.0 MINIMUM		<=8.5 MAXIMUM	12 - SU		Once Per Discharge	GR - GRAB
NODI:	8	NODI				2 - Operation Shutdown		2 - Operation Shutdown				
00530	Solids, total suspended	Smpl.										
1 - Eff	uent Gross											
Seasor	n: 0	Req.					<=30 0 MO AVG	<=60.0 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI;		NODI					2 - Operation Shutdown	2 - Operation Shutdown				
00556	Oil & Grease	Smpl.										
1 - Eff	uent Gross											
Seasor	1: 0	Req.					<=15.0 MO AVG	<=20,0 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI;	-	NODI					2 - Operation Shutdown	2 - Operation Shutdown				
34030	Benzene	Smpl.										
1 - Eff	luent Gross	omp.										
Season	n: 0	Req.				<=1,0 MO AVG			19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NOD1:	-	NODI				2 - Operation Shutdown						
50050	Flow, in conduit or thru treatment plant	Smpl.										
1 - Eff	luent Gross											
Seaso	n: 0	Req.						<=0.5 DAILY MX	03 - MGD		99/99 - Continuous	MS - MEASRD
NODI:	•	NODI						2 - Operation Shutdown				
50060	Chlorine, total residual	Smpl.										
1 - Eff	luent Gross											
Seaso	n: 0	Req.					<=0.1 MO AVG		19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI:		NODI					2 - Operation Shutdown					

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:

HIEDISTURM

Name:

Hiedi Sturm

E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2020-01-28 09:55 (Time Zone:-05:00)

Report Last Signed By

User:

HIEDISTURM

Name:

Hiedi Sturm

E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2020-01-28 15:40 (Time Zone:-05:00)

Permit ID: Permittee: DC0000094

Major:

Permittee Address:

701 Ninth Street, NW, Room 6219

WASHINGTON, DC20019 3300 BENNING ROAD, N.E.

Facility:

PEPCO - BENNING

Facility Location:

WASHINGTON , DC20019

Permitted Feature:

202 - External Outfall

Discharge:

202-A - COOLING TOWER BLOWDOWN

Report Dates & Status

NetDMR Validated Status:

Monitoring Period: From 10/01/19 to 12/31/19

PEPCO Environment Management Services

DMR Due Date:

01/31/20

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name:

William

Last Name:

Sullivan

Title:

VP, Operations

Telephone:

202-872-2942

No Data Indicator (NODI)

Name

Form NODI:

Code

Parameter

NODI

Quantity or Loading

Value 1 Value 2 Units Value 1

Quality or Concentration

Value 2 Value 3 Units Ex.

Freq. of of Analysis

Smpl.

Parameter	NODI	Quant	ity or Loading			Quality or Conc	entration		#	Freq. of	Smpl.
Code Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis	Type
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						2 - Operation Shutdown				
00400 pH 1 - Effluent Gross	Smpl.										
Season: 0	Req.				>=6.0 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -	NODI				2 - Operation Shutdown		2 - Operation Shutdown				
01034 Chromium, total [as Cr]	Smpl.										
Season: 0	Req.					<=0.2 MO AVG	<=0.2 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI					2 - Operation Shutdown	2 - Operation Shutdown				
01092 Zinc, total [as Zn] 2 - Effluent Net	Smpl.										
Season: 0	Req.					<=1.0 MO AVG	<=1,0 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI					2 - Operation Shutdown	2 - Operation Shutdown	1050		,	
39496 PCB-1242											
1 - Effluent Gross	Smpl.										
Season: 0	Req.						Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR • GRAB
NODE: -	NODI						2 - Operation Shutdown				
39504 PCB-1254	Smpl.										
1 - Effluent Gross	-										
Season: 0	Req.						Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI						2 - Operation Shutdown				
39508 PCB-1260 1 - Effluent Gross	Smpl.										
Season: 0	Req.						Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI						2 - Operation Shutdown				
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	2 - Operation Shutdown	2 - Operation Shutdown								
50064 Chlorine, free available	Smpl.										
1 - Effluent Gross											
Season: 0	Req.					<=0.2 MO AVG	<=0.5 DAILY MX	ng/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI										

Parameter		NODI	Quantity or Loading			Quality or Concentration					Freq. of	Smpl.
Code	Name		Value 1	Value 1 Value 2 U		Units Value 1 Value 2 Value 3 U				of Ex.	Analysis	Type
							2 - Operation Shutdown	2 - Operation Shutdown				
	Bromine, reported as the element	Smpl.										
1 - Efflu	ent Gross											
Season:	0	Req.					Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI					2 - Operation Shutdown	2 - Operation Shutdown				

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:

HIEDISTURM

Name:

Hiedi Sturm

E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2020-01-28 09:57 (Time Zone:-05:00)

Report Last Signed By

User:

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Name:

Hiedi Sturm

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hiedi.sturm@exeloncorp.com

Date/Time:

2020-01-28 15:40 (Time Zone:-05:00)

Permit Permit ID: DC0000094 Major: Permittee Address: Permittee: PEPCO Environment Management Services 701 Ninth Street, NW, Room 6219 WASHINGTON, DC20019 Facility: PEPCO - BENNING Facility Location: 3300 BENNING ROAD, N.E. WASHINGTON, DC20019 Permitted Feature: 202 External Outfall Discharge: 202-B - COOLING TOWER BASIN WASH WATER Report Dates & Status Monitoring Period: From 10/01/19 to 12/31/19 DMR Due Date: 01/31/20 Status: **NetDMR Validated** Considerations for Form Completion COOLING TOWER UNITS 15 & 16 Principal Executive Officer First Name: William Last Name: Sullivan VP, Operations Telephone: 202-872-2942 No Data Indicator (NODI) Form NODI: Parameter NODI Quantity or Loading Quality or Concentration # Freq. of Smol of Analysis Type Units Ex. Code Name Value 1 Value 2 Units Value 1 Value 2 Value 3 00400 pH Smpt. 1 - Effluent Gross 01/90 -<=8.5 MAXIMUM >=6.0 MINIMUM Season: 0 Rea. Quarterly GRAB 2 - Operation 2 - Operation NODI: -NODI Shutdown Shutdown 00530 Solids. total Smpl. suspended 1 - Effluent Gross <=30.0 MO <=100.0 DAILY 01/90 -19 -GR -Season: 0 Req. AVG mg/L Quarterly GRAB 2 - Operation 2 - Operation NODE: -NODI Shutdown Shutdown 39496 PCB-1242 Smpl. 1 - Effluent Gross 01/90 -<=1.0 DAILY MX Season: 0 Req. ug/L Quarterly GRAB 2 · Operation NODE: -NODI 39504 PCB-1254 Smpl. 1 - Effluent Gross 01/90 -<=1.0 DAILY MX 20-Season: 0 Req. Quarterly GRAB 2 - Operation NODI: -NODI Shutdown 39508 PCB-1260 Smpl. 1 - Effluent Gross 01/90 -Season 0 <=1.0 DAILY MX Req. Quarterly GRAB 2 - Operation NODE: -NODI Shutdown 50050 Flow, In conduit or thru treatment Smpl. plant 1 - Effluent Gross Req Mon DAILY 01/90 - ES -Req Mon MO Season. 0 Reg. MGD Quarterly ESTIMA MX 2 - Operation 2 - Operation NODI: -NODI

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:

HIEDISTURM

Name:

Hiedi Sturm

E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2020-01-28 09:56 (Time Zone:-05:00)

Report Last Signed By

oser:

HIEDISTURM

Name:

Hiedi Sturm

E-Mail:

hiedi.sturm@exeloncorp.com

Date/Time:

2020-01-28 15:40 (Time Zone:-05:00)

Permit Permit ID:	D	0000094			Maior							
Permittee:			nt Management S	90/1095	Major: Permittee	Addrass:	701	Ninth Street, NW,	Poom 621	٥		
Facility:		PCO - BENNING	-	ervices	Facility Loc		WAS	WASHINGTON , DC20019 3300 BENNING ROAD, N.E.				
•	20	2 5 110	\€-0				WAS	SHINGTON , DC20	019		TCD	
Permitted Featur Report Dates & S		2 - External Ou	uttall		Discharge:		202-	-B - COOLING TO	WER BASI	N WASH WA	IER	
Monitoring Perio		om 10/01/19 to	12/31/19		DMR Due D	ate:	01/3	31/20				
Status:	Ne	etDMR Validate	ed									
Considerations for COOLING TOWER												
Principal Executi							6 11					
First Name: Title:		lliam , Operations			Last Name Telephone:		Sulli	van -872-2942 <u>∎</u> ©				
No Data Indicate					Tarapriorita:	,	202	572 231263				
Form NODI:	-	-,										
Parameter	NODI	Quan	tity or Loading			Quality or	Conce	entration	# 01	Freq. of Analysis	Smpl. Type	
Code Name		Value 1	Value 2	Units	Value 1	Value	2	Value 3	Units Ex		.,,,	
00400 рН	Smpl.									•		
1 - Effluent Gross Season: 0	Req.				MUMINIM 0.8=<			<=8.5 MAXIMUM	12	01/90 -	GR -	
	NODI				2 - Operation			2 - Operation	SU	Quarterly	GRAB	
NODI: -	NODI				Shutdown			Shutdown				
00530 Sollds, total suspended	Smpl.											
1 - Effluent Gross												
Season: 0	Req					<=30.0 M AVG	10	<=100.0 DAILY MX	19 mg/L	01/90 - Quarterly	GR - GRAB	
NODI: -	NODI					2 - Operat Shutdown		2 - Operation Shutdown				
39496 PCB 1242	Smpl.											
1 - Effluent Gross												
Season: 0	Req.							<=1.0 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB	
100N	NODI							2 - Operation Shutdown				
39504 PCB-1254	Smpl.											
1 - Effluent Gross												
Season: 0	Req.							<=1.0 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB	
NODI:: ·	NODI							2 - Operation Shutdown				
39508 PCB-1260	C1											
1 - Effluent Gross	Smpl.											
Season 0	Req.							<=1.0 DAILY MX	28 - ug/L	01/90 · Quart≥rly	GR - GRAB	
HODI: -	NODI							2 - Operation Shutdown				
50050 Flow, in conduit or thru treatment plant	Smpl.											
1 · Effluent Gross												
Season 0	Req.	Req Mon MO AVG	Req Mon DAILY MX	03 MGD						01/90 - Quarterly	ES - ESTIMA	
HODI -	NODI	2 - Operation Shutdown	2 - Operation Shutdown									

Permit ID: DC0000094 Major:

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

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

Permitted Feature: 203 - External Outfall Discharge: 203-A - COOLING TOWER BLOW DOWN

Report Dates & Status

Monitoring Period: From 10/01/19 to 12/31/19 DMR Due Date: 01/31/20

Status: NetDMR Validated

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name: William Last Name: Sullivan

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

No Data Indicator (NODI)
Form NODI:

Parameter NODI Quantity or Loading Quality or Concentration # Freq. of Smpl. of Analysis Type

Code Name Value 1 Value 2 Units Value 1 Value 2 Value 3 Units Ex.

Pa	arameter	NODI	Quanti	ity or Loading			Quality or Conc	entration	#		Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units Ex		туре
00010	Temperature, water deg. centigrade	Smpl,									
1 - Effi	uent Gross										
Season	: 0	Req.						<=2.8 DAILY MX	04 - deg C	01/90 - Quarterly	MS - MEASRD
NODI		NODI						2 - Operation Shutdown			
00400	pH	Smpl.									
1 - Effi	uent Gross										
Season	: 0	Req.				>=6.0 MINIMUM	ı	<=8,5 MAXIMUM	12 - SU	01/90 - Quarterly	GR - GRAB
NODI:	•	NODI				2 - Operation Shutdown		2 - Operation Shutdown			
01034	Chromium, total [as Cr]	Smpl.									
2 - Effi	uent Net										
Season	: 0	Req.					<=0.2 MO AVG	<=0.2 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI;		NODI					2 - Operation Shutdown	2 - Operation Shutdown			
	Zinc, total (as Zn)	Smpl.									
2 - Eff	uent Net										
Season	: 0	Req.					<=1.0 MO AVG	<=1.0 DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
NODI:		NODI					2 - Operation Shutdown	2 - Operation Shutdown			
39496	PCB-1242	Smpl.									
1 - Effi	uent Gross										
Season	: 0	Req.						Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI:		NODI						2 - Operation Shutdown			
39504	PCB-1254	Smpl.									
1 - Effi	uent Gross								0.20-10		
Season	: 0	Req.						Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI:	2	NODI						2 - Operation Shutdown			
39508	PCB-1260										
1 - Effi	uent Gross	Smpl.									
Season	: 0	Req.						Req Mon DAILY	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI:	-	NODI						2 - Operation Shutdown			
50050	Flow, in conduit or thru treatment plant	Smpl.									
1 - Effi	uent Gross										
Season	: 0	Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					MEASD - Measured	
NODI:		NODI	2 - Operation Shutdown	2 - Operation Shutdown							
50064	Chlorine, free available	Smpl.									
1 - Effi	uent Gross										
Season	: 0	Req.					<=0.2 MO AVG	<=0.5 DAILY MX	19 - mg/L	01/90 - Quarterly	GR → GRAB
NODI:		NODI							•		

Parameter		NODI	Quantity	Quantity or Loading			Quality or Concentration					Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	of Ex.	Analysis	Туре
							2 - Operation Shutdown	2 - Operation Shutdown				
71871	Bromine, reported as the element	Smpl.										
1 - Effi	uent Gross											
Season	: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI:	•	NODI					2 - Operation Shutdown	2 - Operation Shutdown				

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: HIEDISTURM Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 09:58 (Time Zone:-05:00)

Report Last Signed By

User: HIEDISTURM Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 15:40 (Time Zone:-05:00)

Dih												
Permit Permit ID:	DO	0000094			Major:		J.					
Permittee:			nt Management S	ervices	-	Address:	701 Ninth Street, NV)			
Facility:	PE	PCO - BENNING		/	Facility Loc	cation:	WASHINGTON , DC20019 3300 BENNING ROAD, N.E. WASHINGTON , DC20019					
Permitted Featur	re: 20	3 - External O	utfall		Discharge:		203-B - COOLING		WASH WA	TER		
Report Dates & S	Status				_							
Monitoring Perio	d: Fr	om 10/01/19 to	12/31/19		DMR Due D	ate:	01/31/20					
Status:	Ne	etDMR Validate	ed									
Considerations for	or Form	Completion										
Principal Executi	ive Offic	er										
First Name:		illiam			Last Name		Sullivan					
Title:		, Operations			Telephone:	•	202-872-2942					
No Data Indicato	-	1)										
Parameter	NODI	Quan	tity or Loading			Quality or	Concentration	# 0f	Freq. of Analysis	Smpl. Type		
Code Name		Value 1	Value 2	Units	Value 1	Value	2 Value 3	Units Ex.		772		
00400 pH	Smpl.											
1 - Effluent Gross	Req.				>=6.0 MINIMUM		<=8 5 MAXIMUN	, 12 ₀	01/90 -	GR =		
Season: 0					2 - Operation		2 - Operation	' SU	Quarterly	GRAB		
NODI - 00530 Solids,	NODI				Shutdown		Shutdown					
total suspended	Smpl.											
1 - Effluent Gross												
Season: 0	Req					<=30.0 M AVG	O <=100.0 DAILY MX	19 - mg/L	01/90 = Quarterly	GR - GRAB		
NODI: -	NODI					2 - Operat Shutdown						
39496 PCB-1242	Smpl.											
1 - Effluent Gross												
Season 0	Req.						<=1.0 DAILY M	28 - ug/L	01/90 - Quarterly	GR - GRAB		
NODL -	NODI						2 - Operation Shutdown					
39504 PCB-1254	Smpl.											
1 - Effluent Gross												
Season: 0	Req.						<=1.0 DAILY M)	(28 - ug/L	01/90 - Quarterly	GR - GRAB		
NODI	NODI						2 - Operation Shutdown					
39508 PCB-1260	Smpl.											
1 - Effluent Grass	•											
Season: 0	Req.						<=1.0 DAILY (4)	(28 - ug/L	01/90 = Quarterly	GR ≅ GRAB		
NODI: -	NODI						2 - Operation Shutdown					
50050 Flow, in conduit or thru treatment plant	Smpl.											
1 - Effluent Gross												
Season 0	Req	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					01/90 - Quarterly	ES - ESTIMA		
NODI: -	NODI	2 - Operation Shutdown	2 - Operation Shutdown									

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: HIEDISTURM
Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 09:58 (Time Zone: -05:00)

Report Last Signed By

User: HIEDISTURM
Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 15:40 (Time Zone:-05:00)

Permit ID: DC0000094

Permittee: PEPCO Environment Management Services Permittee Address:

701 Ninth Street, NW, Room 6219 WASHINGTON , DC20019 3300 BENNING ROAD, N.E. Facility: PEPCO - BENNING

Major:

Facility Location: WASHINGTON, DC20019

Permitted Feature: 101 - External Outfall 101-Q - (no description) Discharge:

Report Dates & Status

Manitoring Period: From 10/01/19 to 12/31/19 DMR Due Date: 01/28/20

Status: NetDMR Validated

Considerations for Form Completion

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

Principal Executive Officer

Last Name: Sullivan First Name:

202-872-2942 VP, Operations Telephone:

No Data Indicator (NODI) Form NODI:

Parameter NODI Quantity or Loading Quality or Concentration # Freq. of Smpl. of Analysis

Value 1 Value 2 Units Value 1 Value 2 Value 3 Units Ex. Code Name

Par	ameter	NODI	Quantity	or Loading			Quality or Conce	ntration		# of	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units			
00400	pH	Smpl.				=8.04		=8.04	12 -		01/90 -	GR -
1 - Efflu	ent Gross	Smpi.				=8.04		=8.04	SU		Quarterly	GRAB
Season:	0	Req.				>=6 0 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: •		NODI										
00530	Solids, total suspended	Smpl.					=50.0	=50.0	19 - mg/L		01/90 - Quarterly	GR - GRAB
1 - Efflu	ent Gross											
Season:	0	Req.					Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00556												
	Grease	Smpl.					<5.38	<5.38	19 - mg/L		01/90 - Quarterly	GR - GRAB
1 - Efflu	ent Gross											
Season:	0	Req.					Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI:		NODI										
00980	Iron, total								19 -		01/90 -	GR -
	recoverable	Smpl.					=4.1	=4,1	mg/L		Quarterly	GRAB
1 - EMIU	ent Gross											
Season:	0	Req.					Req Mon MO AVG	Req Mon DAILY MX	mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01027	Cadmium, total [as Cd]	Smpl.					<1.25	<1.25	28 - ug/L		01/90 - Quarterly	GR - GRAB
1 - Efflu	ent Gross								- J		quarterry	Citals
Season:	0	Req.					Req Mon MO AVG	Req Mon DAILY MX	28 ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI							-1,00			
	Copper,											
01042	total (as Cu)	Smpl.					=52.1	=52.1	28 - ug/L		01/90 - Quarterly	GR - GRAB
1 - Efflu	ent Gross								ugra		quartery	0.010
Season:	0	Req.					Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR -
NODI: -		NODI						• • • • • • • • • • • • • • • • • • • •	09/2		Quarterry	GIGAB
		NODI										
01051	Lead, total [as Pb]	Smpl.					=45.4	=45.4	28 -		01/90 -	GR -
1 - Efflu	ent Gross	S.I.Ipii						, , , , , , , , , , , , , , , , , , , ,	ug/L		Quarterly	GRAB
G 200	•						Reg Mon MO	Reg Mon DAILY	28 -		01/90 -	GR -
Season:	U	Req.					AVG	мх	ug/L		Quarterly	GRAB
NODI: -		NODI										
01067	Nickel, total [as											
	Nil	Smpl.					= 34,2	=34.2	28 - ug/L		01/90 - Quarterly	GR - GRAB
1 - Efflu	ent Gross								-			
Season:	0	Req.					Req Mon MO AVG	Req Mon DAILY	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01092	Zinc, total											
	(as Zn)	Smpl.					= 124.0	=124,0	28 - ug/L		01/90 - Quarterly	GR - GRAB
1 - Emu	ent Gross						Ban 44 415	Ban Mar B. 1111	36		04400	CD
Season		Req.					Req Mon MO AVG	Req Mon DAILY MX	ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
39496	PCB-1242	Smpl.					=0.0	=0.0	28 -		01/90 -	GR -
	ent Gross							10 TO	ug/L		Quarterly	GRAB
Season:	0	Req.										

Par	rameter	NODI	Quantity	or Loading			Quality or Conce	ntration	#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	of Units Ex.	Analysis	Туре
							Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI:		NODI									
39504	PC8-1254	Smpl.					=0.0	=0.0	28 -	01/90 -	GR -
1 - Efflu	ent Gross	эттри					-0.0	-0.0	ug/L	Quarterly	GRAB
Season	: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
39508	PCB-1260	Smpl.					= 0.0	=0.0	28 -	01/90 -	GR -
1 - Efflu	ient Gross	Silipi.					-0.0	-0.0	ug/L	Quarterly	GRAB
Season	: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI:	•	NODI									
50050	Flow, in conduit or thru treatment plant	Smpl.					=0.124	=0.124	03 · MGD	01/90 - Quarterly	ES - ESTIMA
1 - Efflu	ient Gross										
Season	: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	01/90 - Quarterly	ES - ESTIMA
NODI: -		NODI									
TS000	Toxicity, Acute	Smpl.									
1 - Efflu	ent Gross										
Season	: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	2F - tox acute	01/5Y - Once Every 5 Years	24 - COMP24
NODI:		NODI					9 - Conditional Monitoring - Not Required This Period	9 - Conditional Monitoring - Not Required This Period			

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 previously met in compliance with the permit condition, therefore, no further sampling was conducted.

Attachments

Name Type Size
2019_Q4_Outfall_101_NPDES_Storm_Event_and_TMDL_Reductions.pdf pdf 75538.0

Report Last Saved By

PEPCO Environment Management Services

User: HIEDISTURM
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E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 08:47 (Time Zone:-05:00)

Report Last Signed By

User: HIEDISTURM
Name: Hiedi Sturm

E-Mail: hiedi.sturm@exeloncorp.com

Date/Time: 2020-01-28 15:40 (Time Zone:-05:00)

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Attachment 1

NPDES Permit DC 0000094

Permit Condition Part II. A

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

		Storm Event Monitor	ring Requirements	3
Outfall Number	Sample Date	Duration of Storm Event (in hours)	Rainfall Measurement (in inches)	Duration Between Measurable Storm Events (hours)
101	11/22/2019	2.3	0.12	78 hrs

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction Calculations for the November 22, 2019 sampling event at Outfall 101.

Benning Generating Station Pollutant Load Percent Reduction Washington, DC

Outfall	Parameter	Sample Dates	Average Concentration (mg/L) (a) ⁽¹¹⁾	Average Flow (cfs) ⁽²⁾	Load (mg/s)	Maximum Daily Limit (mg/L) (c)	Maximum Daily Stormwater Discharge Concentrations Goals for Metals (b)	Baseline Concentration (mg/L)		Source of Baseline Concentration ⁽¹⁰⁾	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ⁽⁷⁾	Pollutant Concentration Reduction Compared with Baseline Concentration ⁽⁸⁾	Pollutant Load Concentration Compared with Baseline Load ⁽⁸⁾
013Q	TSS	11/18/2019	7.2	1.16	236.50	100	100	42	(b) Highest TSS discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005	Highest TSS discharge concentration from DMR data. Quarterly stormwater DMR data for Oct-Dec 2010. TSS was not reported on DMRs prior to Jul-Sep 2009. Flow was measured in October 2010.	4.82	5732	93%	83%	96%
013Q	Cadmium	11/18/2019	<0.000250	1.16	0.0 (1)	0.00495	0.0045	0.00075	(b) Reasonable potential analysis concentration for cadmium	Highest cadmium discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jan-Mar 2006.	7.48	0.16	100%	100%	100%
013Q	Copper	11/18/2019	0.0011	1.16	0.04	0.01344	0.0134	0.064	(b) Highest copper discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2006	Highest copper discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2006.	3.14	5.7	92%	98%	99%
013Q	Iron	11/18/2019	0.6	1.16	19.71	1.00	NA	5.80	(f) Highest iron discharge concentration from DRM data for Outfall 013Q. Quarterly Stormwater DMR Data for Jul-Sep 2007.	Highest iron discharge concentration from DMR data for Outfall 013Q. Quarterly Stormwater DMR Data for Jul-Sep 2007.	0.148	24	40%	90%	19%
013Q	Nickel	No Sample		1.16		0.117 ⁽⁵⁾	0.117	0.056	(b) Reasonable potential analysis concentration for nicke	Highest nickel discharge concentration from DMR data for Outfall 013Q. Quarterly Stormwater DMR Data for Jul-Sep 2007.	0.148	0.23			
013Q	Lead	11/18/2019	<00010	1.16	0.0 (1)	0.06458	0.0645	0.023	(f) Highest lead discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data forJan- Mar 2006	Highest lead discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data forJan-Mar 2006.	7.48	4.9	100%	100%	100%
013Q	Zinc	11/18/2019	0.0794	1.16	2.6	0.11718	0.117	0.9	(b) Highest zinc discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005	Highest zinc discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005.	5.15	131	32%	91%	98%
013Q	Zinc	12/30/2019	0.0683	0.84	1.6	0.11718	0.117	0.9	(b) Highest zinc discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005	Highest zinc discharge concentration from DMR data. Quarterly stormwater DMR data for Apr-Jun 2005.	5.15	131	42%	92%	99%
013Q	PCB-1242	11/18/2019	<0.000500	1.16	0.0 ⁽¹⁾	No Discharge	NA	0		Quarterly DMRs for Outfall 013Q. PCB Aroclors were not detect from 2005 to 2010.	NA ⁽⁹⁾	0(9)	0%	0% ⁽³⁾	0% ⁽³⁾
013Q	PCB-1254	11/18/2019	<0.000500	1.16	0.0 ⁽¹⁾	No Discharge	NA	0		Quarterly DMRs for Outfall 013Q. PCB Aroclors were not detect from 2005 to 2010.	NA ⁽⁹⁾	0 ⁽⁹⁾	0%	0% ⁽³⁾	0% ⁽³⁾
013Q	PCB-1260	11/18/2019	<0.000500	1.16	0.0 ⁽¹⁾	No Discharge	NA	0		Quarterly DMRs for Outfall 013Q. PCB Aroclors were not detect from 2005 to 2010.	NA ⁽⁹⁾	O ⁽⁹⁾	0%	0% ⁽³⁾	0% ⁽³⁾
Manhole K	TSS	11/22/2019	50	0.19	269	Monitor Only	NA	41		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	259	NA	-22%	-4%
Manhole K	Cadmium	11/22/2019	<0.00125	0.19	0.0 ⁽¹⁾	0.0045 ⁽⁶⁾	0.0075	0.0012		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	0.0076	100%	100%	100%
Manhole K	Copper	11/22/2019	0.0521	0.19	0.280	0.0134 ⁽⁶⁾	0.0134	0.093		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	0.59	-289%	44%	52%
Manhole K	Iron	11/22/2019	4.1	0.19	22.1	Monitor Only	NA	3.8		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	24	-853%	-8%	8%
Manhole K	Nickel	11/22/2019	0.0342	0.19	0.184	0.117 ⁽⁶⁾	0.117	0.09		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ . Flow was measured in September 2011.	0.223	0.57	71%	62%	68%
Manhole K	Lead	11/22/2019	0.0454	0.19	0.244	0.0645 ⁽⁶⁾	0.0645	0.13		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	0.82	30%	65%	70%
Manhole K	Zinc	11/22/2019	0.124	0.19	0.67	0.117 ⁽⁶⁾	0.117	0.57		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	3.6	-6%	78%	81%
Manhole K	PCB-1242	11/22/2019	<0.000500	0.19	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ . Flow was measured in September 2011.	0.223	0 ₍₉₎	NA	0% ⁽³⁾	0% ⁽³⁾
Manhole K	PCB-1254	11/22/2019	<0.000500	0.19	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾		Third Quarter 2011 DMR for Manhole K ^{(4).} Flow was measured in September 2011.	0.223	0 ⁽⁹⁾	NA	0% ⁽³⁾	0% ⁽³⁾
Manhole K	PCB-1260	11/22/2019	<0.000500	0.19	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾		Third Quarter 2011 DMR for Manhole K ⁽⁴⁾ Flow was measured in September 2011.	0.223	0(9)	NA	0% ⁽³⁾	0% ⁽³⁾

Sources:

(a) Microbac, 2019 Fourth Quarter Sample Analytical Results Microbac Laboratories, Inc.

(b) USEPA, 2009a. Authorization to Discharge Under the National Pollutant Discharge Elimination System Industrial Permit Number: DC0000094. United States Environmental Protection Agency. Effective July 19, 2009. (c) Maximum Daily Limit listed in the 2009 NPDES Permit

Notes:

cfs - cubic feet per second mg/L - milligrams per NA - Not applicable NS - Not sampled

mg/L - milligrams per liter mg/s - milligrams per second

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

Prepared by: EFT 10/24/2019

⁽²⁾ Flow was calculated using using November 18th and December 30th (Outfall 013) and November 22nd (Manhole K) rainfall and site data.

⁽³⁾ Not required by 2009 NPDES Permit for Benning Generating Station.
(4) Data from the September 5, 2011 sampling event for Manhole K was established as the ba

⁽⁴⁾ Data from the September 5, 2011 sampling event for Manhole K was established as the baseline load because it was the first sample collected after Manhole K was retrofitted. The retrofit was performed so that a representative

sample could be collected from Manhole K. Flow was estimated based on the storm intensity and catchment area.

⁽⁵⁾ No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentrations Goals for Metals listed in Section VIII.E of the 2009 NPDES Permit for Benning Generating Station.

⁽⁶⁾ Manhole K has no maximum daily limit for the constituent and is monitoring only. Value listed is the Maximum Daily Stormwater Discharge Concentrations Goals for Metals listed in Section VIII.E of the 2009 NPDES Permit for Benning Generating Station.

⁽⁷⁾ Positive values indicates that the June 2019 concentrations are lower than the maximum daily limit for the pollutants.

⁽⁸⁾ Positive values indicate that the June 2019 concentrations/loads are lower than the baseline concentrations/loads.

⁽⁹⁾ There were no detections of PCB Aroclors. Therefore, a baseline flow was not established. However, given that the concentration of PCB Aroclors is zero, the load is also zero regardless of flow.

Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 013Q from 2005 to 2007. TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2009 to 2010 DMRs for Outfall 013Q.

⁽¹¹⁾ November 18th zinc data is an average of the original analysis and re-analysis of the original sample

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

Annual Inspection of the Drainage System in 2019

As described in the prior quarterly report, an internal inspection of the facility's drainage system, using closed circuit television (CCTV), was conducted between April 22 and May 21, 2019 by Insight, LLC.

Insight's evaluation of the CCTV inspection data indicated that most of the storm drain lines that discharge to Outfall 013 are in good condition, but the inspection identified evidence of structural defects (cracks and visible reinforcement) with deposits and debris in various locations within the drainage system. Insight recommended the following corrective actions to address the conditions of the storm drain laterals in three areas identified below:

MH 69A to Inlet (I)69 - realign/replace the pipe to correct the joint offset.

MH 51 D to the downstream T connection - replace

MH 56 to 157 - replace the broken pipe segment.

In January 2020 PEPCO walked down the repair sites with its construction contractor, FLIPPO construction. During the walkdown, it was discovered that one of the sites identified for repair, MH 51 D to the downstream T connection, had already been repaired as part of the other repairs completed in 2019. It is expected that FLIPPO will complete the repair of remaining two sections identified above within the next few months, weather dependent

Insight also attempted to perform a CCTV inspection of the storm drain laterals and inlets located in the area of the former power plant that discharge to Outfall 101. As experienced in prior attempts to conduct camera surveys of the underground drainpipes in this area, camera access was significantly constrained by segments of collapsed pipe, the small diameter of certain of the lateral lines, and the presence of debris and standing water.

As reported in our 3rd Quarter 2019 status report, Pepco retained Princeton Hydro to conduct an investigation of the Outfall 101 stormwater inlet and drainage areas. This investigation included on-site subsurface investigations conducted on December 10th and 19th, 2019. These subsurface investigations included both physical and CCTV inspections along with dye testing of stormwater inlets associated with the Outfall 101 drainage area. The results from this investigation revealed that several of the stormwater inlets, previously thought to discharge to outfall 101 are most likely not draining to outfall 101.

As follow up to the December investigation, PEPCO and Princeton Hydro will be working to close off stormwater inlets that are no longer functioning to convey stormwater to a surface discharge point, doing further dye testing to determine drainage pathways and identifying other potential receiving sources (MS4 drains) to definitely conclude which remaining stormwater areas, if any,

discharge to outfall 101. PEPCO will be sending a proposal to EPA and DOEE on the modifications to the existing stormwater inlet structures recommended for this outfall and will provide an update on status of this follow-up investigation, to be conducted in the 1st quarter, 2020 in our 1st Quarter, 2020 status report.

Site Drainage Map

An update of the Benning drainage area map was completed by AECOM in December 2019. A copy of the new drawing is attached. Dependent on the final results of the outfall 101 investigation, discussed above, another revision of the drawing most likely will occur in 2020.



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

Storm Drain Inlets Inspection Logs

The inspection logs for October - December 2019 are attached.

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AY DATE IO 13		Swapt asse	l	0 (3/3/0			Swest grace								Charles Ba				of the					(PC(10)	management of the state of the		
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TORM DR	NEEDS GREEN BOOM								n Grass To	In Grass To	n Grass To	n Grass To	n Grass To														
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Date 10/21//9	, , COMMENTS		Swell ground Filter			closed grite off & clocked titles				SWEPT GREAT CROWN FITTER	100		swert boom aff) (19th)							APPLIS UP BOOMS	
Date	NEEDS GUARD PLUS																					
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ET FOR M	NEEDS GREEN BOOM																					
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OR TUESD	NEEDS GUARD PLUS																					
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4017	Drain Number	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42

ESDAY DATE $(6/33/19)$	COMMENTS	Swept account filter		SCHOOLD GROUND BORNS							STACT ABOUND FORM				(201900) FIFER					1201ace > (300,05	
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SHEET FC	NEEDS REGULAR BOOM				MARKALIA AMBARIA AMBARIA MARKANIA MARKA				stem In Th					al Plate				ıl Plate			A COLUMN TO A COLU
RM DRAIN SHEET FOR WEDNESDAY	NEEDS GREEN BOOM								The Drain System In The Yard					No Filter Required, Solid Metal Plate				No Filter Required, Solid Metal Plate			
PEPCO STOR	NEEDS FILTER													r Required,				r Required,			
ЬE	NEEDS FIXING								Drain System Not Attach To					No Filte	7.7			No Filte			
1/2/2	ОК	7	7	\ \		7	/	7	Drain S	/		7	7		\	7				100	7
5 6/12	Drain Number	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	09	61	62

THURSDAY DATE 15 スト (Q	NEEDS GUARD COMMENTS PLUS	C(CCA) 0100,00 6, (CC				Chorne FItters	2			C34() OVC 386 OVS ()					& they of boom								
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ORM DRAIN SHEET FOR THURSDAY	NEEDS GREEN BOOM																						Ouside Of Pepco Yard
PEPCO STO	NEEDS FILTER			A Committee of the Comm																			No Filter Required, O
	NEEDS FIXING						****																No Filter
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>	Drain Number	63	64	65	99	29	89	69	70	71	72	73	7.4	75	76	77	78	79	80	81	82	83	84

Such Account of Here CLEAND ON BOOMS DATE 10/25/19 all Booms OF COSTO いろんのす 1800 PEPCO STORM DRAIN SHEET FOR FRIDAY NEEDS GUARD PLUS No Filter Required, Drains On Grass Towards The Corner No Filter Required, Drains On Grass Towards The Corner No Filter Required, Drains On Grass Towards The Corner No Filter Required, Drains On Grass Towards The Corner No Filter Required, Drains On Grass Towards The Corner NEEDS REGULAR BOOM NEEDS FIXING NEEDS FILTER BOOM 100 102 104 106 103 105 86 89 90 91 92 93 94 95 96 98 66

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FOR MONDAY DATE $10-99-19$	NEEDS GUARD PLUS																								
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DATE 10/39/19	COMMENTS			1 Production .																		The state of the s
PEPCO STORM DRAIN SHEET FOR TUESDAY	NEEDS GUARD PLUS																					
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N DATE 10-30-19	COMMENTS			deposition of the second secon	The second secon																
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SHEET FO	NEEDS REGULAR BOOM								stem In T				en e	al Plate	The state of the s			al Plate			
RM DRAIN	NEEDS GREEN BOOM								Drain System Not Attach To The Drain System In The Yard					ed, Solid Metal Plate				ed, Solid Metal Plate			
PEPCO STOR	NEEDS FILTER								Attach To 1					No Filter Required				No Filter Required			
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	OK	7	7			7	7	7	Drain S		7	1			7	7				Ţ	7
	Drain Number	43	44	45	46	47	48	49	20	51	52	53	54	55	56	22	58	65	09	61	62

PEPCO STORM DRAIN SHEET FOR THURSDAY DATE $ arphi /arphi /arphi$	NEEDS FILTER BOOM BOOM BOOM PLUS COMMENTS																						No Filter Required, Ouside Of Pepco Yard
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	Drain Number	63	64	65	99	29	89	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84

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d	OK NEEDS FIXING NEE	7							No Filter Required,	No Filter Required,	No Filter Required,	No Filter Required,	No Filter Required,														7
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IRM DRAIN SHEET FOR MONDAY DATE $/// \cup // \ominus$	REGULAR PLUS GOARD COMMENTS BOOM	Suppl acound to the				SLAPT AROUND GOOM		542PT 471 482			(Claired F, 17RR ant (120ms)									SLADT GROUND LIFER		Sulpt 9.80000 to Have		
PEPCO STORM	IG NEEDS FILTER BOOM																No Longer Exists								
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500	Drain Number	7	2	3	4	5	9	1 2	8	6	10	TT	12	13	14	15	16	17	18	19	20	21	22	23	24

DATE 11/5/19	COMMENTS			Daylot Curous				WOUS! OVOYO					Lococy Ca						24/7 C1010 0000			
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HEET FOR TI	NEEDS NEEDS REGULAR PL BOOM																					
PEPCO STORM DRAIN SHEET FOR TUESDAY	NEEDS GREEN RE BOOM	No Longer Exists	No Longer Exists			ger Exists					No Longer Exists	No Longer Exists		No Longer Exists	No Longer Exists	No Longer Exists					This Drain Is Covered	
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Sven Kirtz	жо							\	\	\							7	7	7)		7
SVE	Drain Number	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42

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HEET EOP WEDNIESDAY	-	NEEDS GUARD REGULAR PLUS								em In The Yard					late				late				
DEDCO STORM DRAIN SHEET	I CININI DIVAIN SI	NEEDS GREEN BOOM								To The Drain System In					No Filter Required, Solid Metal Plate				No Filter Required, Solid Metal Plate				
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PEPCO STORM DRAIN SHEET FOR THURSDAY DATE $ \mid \mid \mid $	NEEDS FILTER BOOM BOOM PLUS																						No Filter Required, Ouside Of Pepco Yard
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	Drain Number	85	86	87	88	68	90	91	65	93	94	95	96	97	86	66	100	101	102	103	104	105	106	107	108	109	110

	PEPC	PEPCO STORM DRAIN		SHEET FOR MONDAY	ONDAY	Date	
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PEPCO STORM DRAIN SHEET FOR TUESDAY DATE $11/(3/20)/4$	NEEDS FIXING NEEDS FIXING NEEDS GREEN NEEDS GUARD / I BOOM PLUS	No Longer Exists	No Longer Exists			No Longer Exists					No Longer Exists	No Longer Exists		No Longer Exists	No Longer Exists	No Longer Exists					This Drain Is Covered	
EPCO STO	NEEDS FILTER	No Long	No Long			No Long					No Long	No Long		No Long	No Long	No Long					This Drain	
d	NEEDS FIXING																				:	
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	Drain Number	22	23	24	25	56	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42

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DATE	COMMENTS																				
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SHEET FO	NEEDS REGULAR BOOM								stem In Th					I Plate				I Plate			
RM DRAIN	NEEDS GREEN BOOM								To The Drain System In The Yard	i je je vjetje i je je za njednog do je je distrika	and the second s			ired, Solid Metal Plate				ired, Solid Metal Plate	10 mm m m m m m m m m m m m m m m m m m		
PCO STOR	NEEDS FILTER			applient visit and A. P. State Architecture				Control of the Contro			Harding Park			No Filter Required				No Filter Required		many to special to	
PE	NEEDS FIXING					and an analysis of the second			Drain System Not Attach	- Appropriate Appropriate and				No Filt				No Filt	L-mal-property - Main-Lattice		
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	Drain Number	43	44	45	46	47	48	49	50	5.1	52	53	54	55	56	57	58	59	09	61	62

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DAY DATE 11-21-19	COMMENTS																						
PEPCO STORM DRAIN SHEET FOR THURSDAY	NEEDS GUARD PLUS																						
V SHEET F	NEEDS REGULAR BOOM																						pco Yard
RM DRAII	NEEDS GREEN BOOM										,												No Filter Required, Ouside Of Pepco Yard
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	Drain Number	63	64	65	99	67	89	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84

Andre Roberts

PEPCO STORM DRAIN SHEET FOR FRIDAY DATE () - ムルーバス	NEEDS GREEN REGULAR PLUS BOOM BOOM								Orains On Grass Towards The Corner	Drains On Grass Towards The Corner	Drains On Grass Towards The Corner	Orains On Grass Towards The Corner	Orains On Grass Towards The Corner														
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	Drain Number	85	98	87	88	68	06	91	92	93	94	95	96	97	86	66	100	101	102	103	104	105	106	107	108	109	Ç

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	COMMENTS																					
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	DRAIN NUMBER	Ţ	2	м	4	5	9	7	8	6	10	11	12	13	14	15	16	17	18	19	20	21

			EPCO STC	RM DRAIN	SHEET F	PEPCO STORM DRAIN SHEET FOR TUESDAY	DATE	1000	1000 11-26-19
Drain Number	ОК	NEEDS FIXING	NEEDS FILTER	NEEDS FILTER BOOM	NEEDS REGULAR BOOM	NEEDS GUARD PLUS		COMMENTS	
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41	. X	Assentation	This Drain	This Drain Is Covered					
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DATE 11-27-19	COMMENTS																				The state of the s
PEPCO STORM DRAIN SHEET FOR WEDNESDAY	NEEDS GUARD PLUS								e Yard												
SHEET FO	NEEDS REGULAR BOOM								The Drain System In The Yard					al Plate				al Plate			
RM DRAIN	NEEDS GREEN BOOM								he Drain S					No Filter Required, Solid Metal Plate				No Filter Required, Solid Metal Plate			
PCO STOF	NEEDS FILTER								_					er Required				er Required			
PE	NEEDS FIXING								Drain System Not Attach To					No Filte				No Filte			
	ОК	7	7	1	>	7	7	>	Drain 5	>)		7		7	>	/	>	>	>	
	Drain Number	. 43	44	45	46	47	48	49	20	51	52	53	54	55	56	57	58	59	60	61	62 🗸

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i		d	EPCO STO	RM DRAIN	N SHEET FO	PEPCO STORM DRAIN SHEET FOR MONDAY	DATE	0/2/2
Drain Number	ð	NEEDS FIXING	NEEDS FIXING NEEDS FILTER	NEEDS GREEN BOOM	REGULAR	NEEDS GUARD PLUS	J	COMMENTS
Ţ	100 mars 1		THE PARTY OF THE P					- Artifactus
2								Total Transfer of the Control of the
æ	. 7						The state of the s	April 4 Maria and April 4 Mari
4						44444	A Company of the Comp	A STATE OF THE PARTY OF THE PAR
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14							tidanda a de la companya de la compa	Average de la constitución de la
15							T PANTIFICATION OF THE PANTIFI	Children in the Children in th
16			No Longer Exists	er Exists			and the same of th	The second secon
17							Principal Control of the Control of	
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19							Through the man and a state of the state of	The state of the s
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22		a philippolitable and color						interpretation and the second
23		1144					###Nominated Projection and Projecti	
24								

		Ъ	EPCO STO	RM DRAIN	SHEET F	PEPCO STORM DRAIN SHEET FOR TUESDAY	DATE 12 - 03 - 19
Drain Number	XO	NEEDS FIXING	NEEDS FILTER	NEEDS GREEN BOOM	NEEDS REGULAR BOOM	NEEDS GUARD PLUS	COMMENTS
22		**************************************	No Long	No Longer Exists			
23			No Long	nger Exists			TOTAL
24							
25							
56			No Long	nger Exists			
27	A A A A A A A A A A A A A A A A A A A				The state of the s	Value in the state of the state	Andrews Company Compan
28							Transfer of the second of the
29	٦						
30	` >						
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35	and the state of t		No Long	nger Exists			
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37	>						
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40							
41	E conjugation, and the second		This Drain	in Is Covered			
42							

VESDAY DATE	RD COMMENTS		FIRE WAS & BY TOTAL WITH								A TOO STATE OF VA		The second secon		The state of the s		Transfer to the state of the st	Transferred Transf	The second secon		
N WEDN	NEEDS GUARD PLUS								ne Yard									discount Annual Advantage			
SHEET FC	NEEDS REGULAR BOOM								stem In T	The state of the s				al Plate				al Plate	The state of the s		
RM DRAIN SHEET FOR WEDNESDAY	NEEDS GREEN BOOM								The Drain System In The Yard					, Solid Meta	A MANAGEMENT AND			, Solid Meta			
PEPCO STOR	NEEDS FILTER			THE STATE OF THE S										No Filter Required, Solid Metal Plate				No Filter Required, Solid Metal Plate			
PE	NEEDS FIXING	TO A COLUMN TO THE COLUMN TO T				Vincent of the second of the s			Drain System Not Attach To					No Filte				No Filte			
	OK	ゝ		, , <u>,</u> »				X	Drain S		7	1	$\sqrt{}$		3		w**		i de		7
	Drain Number	43	44	45	46	47	48	49	20	51	52	53	54	55	56	57	58	59	09	61	62

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			PEPCO STC	PEPCO STORM DRAIN SHEET FOR THURSDAY	I SHEET FO	OR THURSE	DAY DATE	12-65-19
Drain Number	OK	NEEDS FIXING	NEEDS FILTER	NEEDS GREEN BOOM	NEEDS REGULAR BOOM	NEEDS GUARD PLUS		COMMENTS
63								Constitution of the Consti
64	" " " " " " " " " " " " " " " " " " "							
65	/							
99								TOTAL CONTRACT OF THE CONTRACT
29								
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78					and the second s	To the second state of the		
79	1							
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81								
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84		No Filter	Required, C	No Filter Required, Ouside Of Pepco Yard	pco Yard		MANAGEMENT AND	, the control of the

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PEPCO STORM DRAIN SHEET FOR FRIDAY DATE ルユーGー/ウ	OK NEEDS FIXING NEEDS FILTER BOOM BOOM BOOM								No Filter Required, Drains On Grass Towards The Corner	No Filter Required, Drains On Grass Towards The Corner	No Filter Required, Drains On Grass Towards The Corner	No Filter Required, Drains On Grass Towards The Corner	No Filter Required, Drains On Grass Towards The Corner								.1						
	ОК	200			>	1	Ž	1	No Fil	`.	``\	`_	>	, i.	```	ڒ	د	à	1	` ` `			5 28				
	Drain Number	85	98	87	88	89	06	91	92	93	94	95	96	97	86	66	1.00	101	102	103	104	105	106	107	108	109	110

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PEPCO STORMI DRAIN OK NEEDS FIXING NEEDS F

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DATE 12-10-19	COMMENTS																					
PEPCO STORM DRAIN SHEET FOR TUESDAY	NEEDS GUARD PLUS																					
I SHEET I	NEEDS REGULAR BOOM									4,	Anny - Arthress formation or a second	- Andrews									A Company of the Comp	
RM DRAIN	NEEDS GREEN BOOM	inger Exists	onger Exists			inger Exists					No Longer Exists	No Longer Exists		No Longer Exists	No Longer Exists	No Longer Exists					This Drain Is Covered	
EPCO STC	NEEDS FILTER	No Long	No Long			No Long		10.000			No Long	No Long		No Long	No Long	No Long					This Drain	
Ιd	NEEDS FIXING							444444										- I - I - I - I - I - I - I - I - I - I				
	OK			1						1					Angeningen (1998), market		ì	٦				į
	Drain Number	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42

DATE $/ {\mathbb Q}/ /l / / /3$	COMMENTS																				
FORM DRAIN SHEET FOR WEDNESDAY	DS NEEDS GUARD LAR PLUS								In The Yard					o.				ช			
ORM DRAIN SHEE	ER BOOM BOOM	, , , , , , , , , , , , , , , , , , ,							The Drain System In The Yard		data in Anthrope Contract			red, Solid Metal Plate				red, Solid Metal Plate			
PEPCO ST	NEEDS FIXING NEEDS FILTER				The second secon		Olivery to the second s		Drain System Not Attach T					No Filter Requi				No Filter Requir			
	ОК	/)	`	Ś	ć			Drain S	>	Š	Ĺ	7		7	7	2)	7)
	Drain Number	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	9	19	62

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1 DATE 12-19	COMMENTS			And the second s	The first test of the first te	TO THE PARTY OF TH	The state of the s				TOTAL	The state of the s			VI S the Step			Sit is the Stall	Ž.	7 7 3	1 5 5		CONTRACTOR OF THE CONTRACTOR O
PEPCO STORM DRAIN SHEET FOR THURSDAY	NEEDS GUARD PLUS				and any of the latest and the latest																		THE STATE OF THE S
SHEET F	NEEDS REGULAR BOOM				mangaran Agrangsa pamahangsa tanan malaksa sara			ATT TO THE TOTAL PROPERTY OF THE TOTAL PROPE															pco Yard
RM DRAIN	NEEDS GREEN BOOM					The state of the s																	No Filter Required, Ouside Of Pepco Yard
EPCO STC	NEEDS FILTER														7				1	7			Required, C
<u> </u>	NEEDS FIXING																						No Filter I
	ОК		. /		7				1	\	7	1				7	j						3
	Drain Number	63	64	65	99	67	89	69	70	71	72	73	74	75	92	77	78	79	80	81	82	83	84

12-13-19 Andr Robaks

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51-91-81	COMMENTS																					
12-													TO THE PARTY OF TH									
Date	NEEDS GUARD PLUS								The second secon													
ONDAY	NEEDS REGULAR BOOM													On the state of th				TO THE PARTY OF TH				
SHEET FOR MONDAY	NEEDS GREEN BOOM									And the second s												
	NEEDS FILTER																					
PEPCO STORM DRAIN	NEEDS FIXING																5.					
DEPCC	OK		1		- I			, p.					`^			,	No longer Exists	· `\		· .		
	DRAIN	↔	2	3	4	2	9	7	8	6	10	11	12	13	14	15	16	17	18	19	20	

		G.	EPCO STO	RM DRAIN	SHEET F	PEPCO STORM DRAIN SHEET FOR TUESDAY	DATE 12- 17/1-1
Drain Number	OK	NEEDS FIXING	NEEDS FIXING NEEDS FILTER	NEEDS GREEN BOOM	REGULAR BOOM	NEEDS GUARD PLUS	COMMENTS
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27	793				- Proprieta de la Companya de la Com		
28	75						
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30							
31			No Lon	No Longer Exists			
32			No Lon	No Longer Exists			
33							
34			No Lon	No Longer Exists			
35			No Lon	No Longer Exists	4.0		
36			No Lon	No Longer Exists			
37							
38							
39	ر الا						And the state of t
40	0						
41	S		This Drai	This Drain Is Covered			
42	70						

William Pass

C. Missa V & S. C.	DATE 12-18-19	COMMENTS																				
	ORM DRAIN SHEET FOR WEDNESDAY	NEEDS GREEN REGULAR BOOM BOOM BOOM								o The Drain System In The Yard					ed, Solid Metal Plate				ed, Solid Metal Plate			
	PEPCO STORI	NEEDS FIXING NEEDS FILTER N						Annual Control of the		Drain System Not Attach To Th		a principal de la companya de la com			No Filter Required,				No Filter Required, S			
		OK	\	>	\	>	\	7	7	Drain 9	>	>	>)		>		>	, , , , , , , , , , , , , , , , , , , ,	\	>	>
		Drain Number	43	44	45	46	47	48	49	20	51	52	53	54	55	56	57	58	59	09	61	62

Masocute August

4Y DATE 12-19-19	COMMENTS			The second secon																Transfer of the state of the st			
PEPCO STORM DRAIN SHEET FOR THURSDAY	NEEDS GUARD PLUS																						
SHEET	NEEDS REGULAR BOOM							And the second s										21.100.000.000.000.000.000.000.000.000.0					oco Yard
NRM DRAIN	NEEDS GREEN BOOM											The second secon											, Ouside Of Pepco Yard
EPCO STC	NEEDS FILTER														\								tequired, O
	NEEDS FIXING NEEDS FILTER																						No Filter Required
	ОК		· Parameter of the second		1.		1.	outer many of the second	1)					1	The second second	Carl Salah			1	
	Drain Number	63	64	65	99	67	89	69	70	7.1	72	73	7.4	22	76	77	78	79	80	8.1	82	83	84

Andre Roberts

	COMMENTS																				
Date	NEEDS GUARD PLUS	The second secon																	magas and complete		
ONDAY	NEEDS REGULAR ROOM																				
SHEET FOR MONDAY	NEEDS GREEN BOOM																	71		on This may the state of the st	
RAIN SHE	NEEDS FILTER																	and the state of t			
PEPCO STORM DRAIN	NEEDS FIXING			THEORY WAR												S				The state of the s	
PEPCO	ОК	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Š.	AND THE PROPERTY OF THE PROPER		à										No longer Exists	**************************************	The state of the s	Chicago proprieta - contra Academica e mangada autor		
	DRAIN NUMBER	 2	ĸ	4	5	9	7	8	6	10	[]	12	13	14	1.5	16	17	18	19	20	2.1

AY DATE (2 /2 - 23 - 19	COV								いらいい いだい とえい										The state of the s	1000 3880000		MELL BECHE LACECE	CS Berns Lyblaced
RM DRAIN SHÉET FOR TUESDAY	NEEDS GUARD PLUS							THE TANKS THE TA											The state of the s				
N SHÉET F	NEEDS REGULAR BOOM													10000									
RM DRAII	NEEDS GREEN BOOM	er Exists	er Exists			er Exists					No Longer Exists	er Exists		No Longer Exists	er Exists	No Longer Exists	And the second s				Is Covered		
PEPCO STO	NEEDS FILTER	No Long	No Long			No Long					No Long	No Long		No Long	No Longe	No Long				The state of the s	This Drain		
ď	NEEDS FIXING NEEDS FILTER																Vaccine	O THE PARTY OF THE		T T T T T T T T T T T T T T T T T T T			
	ОК							>	Ż				Ò	THE STATE OF THE S			Ž			, i			
	Drain Number	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	#3

5 46/1/15 (D. A. Shirens

		J d	PEPCO STOR	RM DRAIN	SHEET FO	FORM DRAIN SHEET FOR WEDNESDAY	DATE 12-23-14
Drain Number	ОК	NEEDS FIXING NEEDS FILT	NEEDS FILTER	NEEDS GREEN BOOM	NEEDS REGULAR BOOM	NEEDS GUARD PLUS	COMMENTS
43)						
44							
45)						
46	\ \						
47							
48							
49	>						
50	Drain !	Drain System Not Attach		o The Drain System In The Yard	rstem In Th	e Yard	
51)						
52)			And the second s	,		
53	>			AAAAAAAA AAAAAAAAAAAAAAAAAAAAAAAAAAAAA			
54)				A CAMARINE AND		
55		No Filt	No Filter Required	red, Solid Metal Plate	II Plate		
56	.7						
57)						
58	7						
59	And control of the co	No Filt	No Filter Required	red, Solid Metal Plate	il Plate		
9							
61		and all of the second s					
62)						

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DAY DATE 12 - 26 - 19))		CONT. MARKET AND ADDRESS AND A			Not in in Stock									Color Color	ļ						Programme and the second secon	
PEPCO STORM DRAIN SHEET FOR THURSDAY	NEEDS GUARD PLUS																						- Control of the Cont
SHEET F	NEEDS REGULAR BOOM																						pco Yard
RM DRAIN	NEEDS GREEN BOOM																						, Ouside Of Pepco Yard
EPCO STC	NEEDS FILTER														7								Required, C
Q.	NEEDS FIXING																						No Filter Required
	ОК	1	1			, ×	1	Ţ	1	1		1	1	7		//					1		7
	Drain Number	63	64	65	99	29	89	69	70	71	72	73	74	75	9/	1.1	78	79	80	81	82	83	84

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PEPCO STORM DRAIN SHEET FOR FRIDAY DATE	NEEDS FIXING NEEDS FILTER BOOM REGULAR PLUS COMMI								No Filter Required, Drains On Grass Towards The Corner	No Filter Required, Drains On Grass Towards The Corner	No Filter Required, Drains On Grass Towards The Corner	No Filter Required, Drains On Grass Towards The Corner	Nø Filter Required, Drains On Grass Towards The Corner														
	Ϋ́O		, de la companya della companya della companya de la companya della companya dell						No Filt	No Filt	No Filt	No Filt	Nø Filt					,									<u> </u>
	Drain Number	85	86	87	88	68	06	91	92	93	94	95	96	97	98	66	100	101	102	103	104	105	106	107	108	109	110

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	COMMENTS																					
PEPCO STORM DRAIN SHEET FOR MONDAY Date	NEEDS GUARD PLUS								The state of the s				n november of the state of the	T C C C C C C C C C C C C C C C C C C C			NOT THE PROPERTY OF THE PROPER				With a division of the control of th	
	NEEDS REGULAR BOOM				The state of the s				American de la constanta de la	The state of the s		A Section of the Control of the Cont				- Parini adoptivo de Parini de La Carta de		And the state of t			The state of the s	
	NEEDS GREEN BOOM										The state of the s			THE THE PARTY OF T	- AMARA			TANKET IN ALTERNATION OF THE PROPERTY OF THE P	, , , , reduces			
	NEEDS FILTER								esse esse esse esse esse esse esse ess						The second secon	THE STATE OF THE S	e de la companya de l		WAYNE DEPARTMENT AND	The state of the s	THE RESIDENCE OF THE PROPERTY	
	NEEDS FIXING									TO THE THE PERSON NAMED IN	A PARTY OF THE PAR	A characteristic and a charact			To a part of the control of the cont		r _S	The state of the s	T T T T T T T T T T T T T T T T T T T			
	ОК							and the second s									No longer Exists					
	DRAIN NUMBER	-	2	3	4	5	9	7	8	6	10	Ţ	12	13	14	15	16	17	18	19	20	21

		d .	PEPCO STO	RM DRAIN	SHEET F	RM DRAIN SHEET FOR TUESDAY	AY DATE @2 -31 -2019
Drain Number	ОК	NEEDS FIXING	NEEDS FILTER	NEEDS GREEN BOOM	NEEDS REGULAR BOOM	NEEDS GUARD PLUS	COMMENTS
22			No Longe	ger Exists			
23			No Long	ger Exists			
24	OK.						
25							C
26	1.		No Longo	ger Exists			
27	$ \mathcal{C}(\mathcal{K}) $						
28	20)
29	ンゆ						
30	O.C.						Changed the boom
31)		No Long	No Longer Exists			0
32			No Longe	er Exists			
33	>						
34			No Long	No Longer Exists			
35			No Long	No Longer Exists			A
36	<u>.</u>		No Long	No Longer Exists			0
37	M						
38							
39	ak						
40	9						Remove + illars an clean
41	/6	A CANADA A C	This Drain	Is Covered			
42							all the borns still re

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

Monthly Site Inspections

The site-wide inspection logs for October – December 2019 are attached. Benning operating areas has been aggressively implementing the best management practices at the site including weekly inspection and maintenance of storm drain inlets, removing the equipment and materials that are no longer in use from the site to eliminate exposure to stormwater, covering or moving indoor the equipment that has the potential to contribute to pollutant loading, and increased supervision of the contractors working at the site to ensure they practice good housekeeping.

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 **Bulk Storage Monthly Inspection Report**

Inspection Date: Dec. 7, 2019 Inspection Time: 1130 Am
Inspector: Maurica Ben Inspector's Signature: Maurica

ZPHI	Salt :	Shed	Soil St	orage	
	Yes	No	Yes	No	Comments
Good Housekeeping Procedures					
Is the area free of potential discharges of leaks and	1		-		
spills?					
Is the site free of litter and debris?	1670				
Are catch basins and other inlets in the area to the storm drain system free from debris?	V				
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	W				
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	1				
Are there signs of drainage issue or overflow at any storm drain inlet?				-	
Bulk Storage Controls					
Are bulk storage areas covered and protected from precipitation?					
Is the storage area protected from run-on of stormwater?	V				
Is the area around the bulk storage area swept after each use and free of material that could mingle with stormwater?	1				
Stored materials do not have an odor or any other indicators of contamination?		V		2	
Is adequate storage space for bulk materials available? If no, disposal of excess materials must be arranged.	V		V		
Spill Prevention & Response					
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	V		V		
Do spill kits contain the proper tools and equipment?				=	
Have all spills been properly cleaned up and disposed of properly in the respective area?	V				
Other Indicators of Illicit Discharges		1		U	
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	V		V		

Site Wide Monthly Inspection Report Pepco – Benning Road Facility

Inspection Date: Dec, 7, 2015
Inspector: MAURIC SCONC

Inspection Time: 10', 00 C

		_		1	1000		000		000		
	Plant Power		rormer cooling	Sunoon	bot East	ast	BSC Central	entrai	BSC South	onth	Comments
	Yes No	2 2	Yes No	2 8	Yes	S S	Yes	No No	Yes	No No	
Good Housekeeping Procedures	╀	T									
Are outside work areas clean, dry, and free of litter and debris?	7		7		7		7		7		
Is the grass and plants properly maintained in the area?	7		7		7		7		7		
Is the area free of potential discharges of leaks and spills?	7		1		1		7		1		
Are containment areas in good condition, with valves closed?	7		7		7		7		7		
Are drums labeled and stored on proper containment?	7		7		7		1		1		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?	NA		5,	<	7		7	A	7	4	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	7		7		7		7		7		
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?	7		7		7		7		7		
Are there signs of drainage issue or overflow at any storm drain inlet?	د .			>		7		7		1	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	N/k	<u></u>	5	*					7		
Do spill kits contain the proper tools and equipment?	7/2	_	7	N	7		7		7		

maurice Banks 10:30 Am

Pepco – Benning Road Facility

Site Wide Monthly Inspection Report

			7	ונע אאונ		oite wide Monthly Inspection Report	Speci	on Ke	בוסנ		541115 8
	Forme	Former Power Former Cooling	Former	Cooling	BSC	BSC East	BSC Central	entrai	BSC South	outh	
	Plan	Plant Area	Towe	er Site	Aı	Area	Area	ea	Area	69	Comments
	Yes	No	Yes	No	Yes	No	Yes	S S	Yes	No No	
Have all spills been properly cleaned up and disposed of properly in the respective area?	7		7		7	\	7		7		
Structural Control Devices											
Has the vehicle wash catch basin been inspected for sediment build-up?	7		>	A	3	#	5	4	3	T	
ls the wash water captured properly not entering storm drain system?	7		3	4	3	10	5	7	2	1	
Erosion and Sediment Controls									,		
Is there any soil erosion, dust or sediment build-up entering the storm drain inlets?		7		7		7		7		7	
Are there uncovered pile of soil or junk metal equipment in the area?		7		1				1		1	
Other Indicators of Illicit Discharges											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?		1		7		1		7		1	

Pepco - Benning Road Facility **Bulk Storage Monthly Inspection Report**

Inspection Date: Nov. 12,2019 Inspection Time: 11,00 AM
Inspector: MAURIO Ball Mapector's Signature: Maurio

ZPHI Soil Storage Yes No Yes **Comments Good Housekeeping Procedures** Is the area free of potential discharges of leaks and spills? Is the site free of litter and debris? Are catch basins and other 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? **Bulk Storage Controls** Are bulk storage areas covered and protected from precipitation? the storage area protected from run-on of rmwater? is the area around the bulk storage area swept after each use and free of material that could mingle with stormwater? Stored materials do not have an odor or any other indicators of contamination? Is adequate storage space for bulk materials available? If no, disposal of excess materials must be arranged. 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? Have all spills been properly cleaned up and disposed of properly in the respective area? Other Indicators of Illicit Discharges Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?

Site Wide Monthly Inspection Report Pepco – Benning Road Facility

Inspection Date: 11-12-3019
Inspector: MAURICE BANKS

Inspection Time: (11.3 & AM)
Inspector's Signature: (1) QUALURE (30.)

The state of the s		- Dec									
TO	Former Plant	Former Power Plant Area	Former Tow	rmer Cooling Tower Site	BSC	BSC East Area	BSCC	BSC Central Area	BSC South Area	outh ea	Comments
	Yes	No	Yes	No	Yes	No	Yes	S	Yes	8	
Good Housekeeping Procedures	14.1										
Are outside work areas clean, dry, and free of litter and debris?	7		7		7		7		7	:5	
is the grass and plants properly maintained in the area?	7	-	7		7		7		7		
is the area free of potential discharges of leaks and spills?	7		7		7		7		1		
Are containment areas in good condition, with valves closed?	7		7		1		1		1		
Are drums labeled and stored on proper containment?	>		7		7		1		7		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?	N	4									
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	>		7		7		7		7		Debris pround Drain 99#
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	7		7		7		7		7		
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	7		>		7		7		7		
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.)?	>	A	3	7.	>		7		7		
Do spill kits contain the proper tools and equipment?	3	. 4	5	A	7		1	,	7		

Pepco - Benning Road Facility

Site Wide Monthly Inspection Report

Mourice Banks 10:30 Am Comments 2 **BSC South** Area Yes õ **BSC Central** Area Yes S **BSC East** Area Yes Former Power | Former Cooling | **Tower Site** S Yes Plant Area S N Yes and disposed of properly in the respective is the wash water captured properly -- not is there any soil erosion, dust or sediment ouild-up entering the storm drain inlets? is the area clear of any signs of potential Have all spills been properly cleaned up llicit discharges such as odors, staining, Has the vehicle wash catch basin been Are there uncovered pile of soil or junk Other Indicators of Illicit Discharges nspected for sediment build-up? **Erosion and Sediment Controls** netal equipment in the area? entering storm drain system? Structural Control Devices sheen, residue, etc.? area?

Pepco - Benning Road Facility Bulk Storage Monthly Inspection Report

m400:11

Inspection Date: DET 10, 2019 Inspection Time: 11:00 4 m
Inspector: Maurice Bank Inspector's Signature: Maurice Bank

APHI	Salt	Shed	Soil S	torage	
401 1 11	Yes	No	Yes	No	Comments
Good Housekeeping Procedures					
Is the area free of potential discharges of leaks and	V				
spills?					
Is the site free of litter and debris?					
Are catch basins and other 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		1.7			
storm drain system?					
Are there signs of drainage issue or overflow at any				,	
storm drain inlet?			1		
Bulk Storage Controls					
Are bulk storage areas covered and protected from					
precipitation?					
is the storage area protected from run-on of			./		
stormwater?					
Is the area around the bulk storage area swept					
after each use and free of material that could	_		1		
mingle with stormwater?					
Stored materials do not have an odor or any other				~	
indicators of contamination?					
Is adequate storage space for bulk materials			. /		
available? If no, disposal of excess materials must				:	
be arranged.					
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?					
Have all spills been properly cleaned up and					
disposed of properly in the respective area?					
Other Indicators of Illicit Discharges					
Is the area clear of any signs of potential illicit					
discharges such as odors, staining, sheen, residue, etc.?					

Site Wide Monthly Inspection Report Pepco – Benning Road Facility

Inspector: Mpulle Bank Inspection Date: OCT 10 2019

Inspection Time:

11:00 AM

Inspector's Signature: 400 Munice,

Comments ž **BSC South** Area Yes **BSC Central** Š Area Yes å **BSC East** Area Yes Former Power | Former Cooling **Tower Site** ž Yes Plant Area ŝ Yes Are outside work areas clean, dry, and free. is the grass and plants properly maintained res, indicate if properly labeled to identify is the area free of potential discharges of Are containment areas in good condition, Are booms in place and in good condition Are catch basins and storm drain inlets in Are witch hats in place, in good condition Are drums labeled and stored on proper Are there any Frac Tanks in the area? If Do spill kits contain the proper tools and he area to the storm drain system free other inlets to the storm drain system? accessible in close proximity to storage at catch basins and other inlets to the s emergency/contingency equipment and free of debris at catch basins and Are there signs of drainage issue or overflow at any storm drain inlet? **Good Housekeeping Procedures** areas (spill kits, drip pans, etc.)? Spill Prevention & Response of litter and debris? storm drain system? vith valves closed? eaks and spills? containment? he content? rom debris? n the area? equipment? OCT 10,2019 Maurice Bonks Maunice Bank

Pepco – Benning Road Facility Site Wide Monthly Inspection Rep

				Site Wide Monthly Inspection Report	de Mc	nthiv	nspect	ion Re	port			
	Form	Former Power	Form	Former Cooling		BSC East	BSCC	BSC Central	BSC	BSC South		
	Pla	Piant Area	Tov	Tower Site	A	Area	¥	Area	₹	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?	7		7		7		7		7			
Structural Control Devices												
Has the vehicle wash catch basin been inspected for sediment build-up?	7		-	\	7	1		1	<			-
is the wash water captured properly not entering storm drain system?	7		2	X.	\sim	V	2	Z	N.	V		
Erosion and Sediment Controls					V		-					-
Is there any soil erosion, dust or sediment build-up entering the storm drain inlets?		7		7		7		7		7		
Are there uncovered pile of soil or junk metal equipment in the area?		7		7		1		7		7		
Other Indicators of Illicit Discharges												
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?		7		7		7		7		7		
							_		_	•		

Inspection Date: 13/30/19 Inspection Time: 11'00 & Inspector's Signature: 11'00 & Inspector's

PPHI	Salvag (Bldg		Scrap (
ATE BED	Yes	No	Yes	No	Comments
Good Housekeeping Procedures					
Is the area free of potential discharges of leaks and					
spills?					land reads for the ordina
Is the site free of litter and debris?			-		hood reals are being pull of
Are catch basins and other inlets in the area to the storm drain system free from debris?		_			7.07.7.2
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?	1				
Are there signs of drainage issue or overflow at any storm drain inlet?					Saluge Yard dirain was drawng very stanty
Scrap Metal Storage					
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	1		/		
all containers labeled with contents on the propriate label?	/				
Are all containers that are not in use closed/covered?	1		1		
Are containers protected from precipitation and runoff whenever practical?	1				
Are containers protected from vehicular traffic?					
Have all containers been inspected and are they generally in good condition?	1		N		
Have scrap parts and empty drums no longer in use been removed from the property?	1		1		A made of metal continues have been Filled of an Shaps
Spill Prevention & Response					saying and were remed recently.
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	1		/		
Do spill kits contain the proper tools and equipment?					then are 2 6055 of Epidy
Have all spills been properly cleaned up and disposed of properly in the respective area?	No	~	NA	re	
Other Indicators of Illicit Discharges					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	/		/		

PHI	_	ge Yard g. 88)		Metal Bidg. 65)	
	Yes	No	Yes	No	Comments
Personnel Training and Record Keeping	ŀ				
Is a program in place to train employees on pollution prevention and good housekeeping procedures?			/		
Are employees trained on proper spill prevention and response for the materials that they handle?	/		1		

Inspection Date: 11/26/19 Inspection Time: 1200 Inspector's Signature: Inspector's Signature: 11/26/19

ZPHI	Salvag (Bldg		Scrap Storage (
	Yes	No	Yes	No	Comments
Good Housekeeping Procedures	/				
Is the area free of potential discharges of leaks and			/		
spills?					
Is the site free of litter and debris?					clared on 11/05
Are catch basins and other 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	,			1	
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?				/	
Scrap Metal Storage					
Is there adequate aisle space and organization in all	/				Pld-65 baskets were reorgail - 2 old ares
storage areas so that any corrosion or leaks can be	V				reorgaid - 2 old ares
detected early?					discorbed
all containers labeled with contents on the			/		
opriate label?					
Are all containers that are not in use	/				10 m Profess, Profess, Profession (14)
closed/covered?					
Are containers protected from precipitation and	/				
runoff whenever practical?		ļ			
Are containers protected from vehicular traffic?					
Have all containers been inspected and are they	V			'	· ·
generally in good condition?					
Have scrap parts and empty drums no longer in use			V		stal real picker last med
been removed from the property?		ļ			
Spill Prevention & Response		-		 	
Is emergency/contingency equipment accessible in			1/		Never par put in
close proximity to storage areas (spill kits, drip			"		Column Area
pans, etc.)?		 			30,1070 2000
Do spill kits contain the proper tools and					
equipment?		-	-		
Have all spills been properly cleaned up and	1 ~/	'A	~	la	
disposed of properly in the respective area?	/-/	1	1	1''	
Other Indicators of Illicit Discharges Is the area clear of any signs of potential illicit	 	+	 	-	
discharges such as odors, staining, sheen, residue,					l
etc.?					1
etc.?					

ZPHI	_	ge Yard g. 88)		Metal Bldg. 65)	
TO THE REAL PROPERTY.	Yes	No	Yes	No	Comments
Personnel Training and Record Keeping					
Is a program in place to train employees on pollution prevention and good housekeeping procedures?	1		1		
Are employees trained on proper spill prevention and response for the materials that they handle?	/		/		

Inspection Date: 10/19/19 Inspection Time: 10:70 Inspector's Signature: 10

MOHI		e Yard g. 88)	Scrap Storage (Metal Bldg. 65)	
200 E B E U	Yes	No	Yes	No	Comments
Good Housekeeping Procedures					
Is the area free of potential discharges of leaks and					
spills?					
Is the site free of litter and debris?					Grea chesad e challed
Are catch basins and other inlets in the area to the storm drain system free from debris?			1		area chosed e closed Cheled OK
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?			1		
Are there signs of drainage issue or overflow at any storm drain inlet?		/		/	
Scrap Metal Storage					
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	/		/		wooden reals removed on
ıll containers labeled with contents on the .opriate label?			/		
Are all containers that are not in use closed/covered?			/	i	
Are containers protected from precipitation and runoff whenever practical?	/		/		
Are containers protected from vehicular traffic?			/		
Have all containers been inspected and are they generally in good condition?			/		Another hopper was discorded
Have scrap parts and empty drums no longer in use been removed from the property?	/		1		Another Logger was discould alumin continer by 65 renord
Spill Prevention & Response					
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	/		/		spill kit a speely dri
Do spill kits contain the proper tools and equipment?	/		/		
Have all spills been properly cleaned up and disposed of properly in the respective area?	N	me	No	e .	
Other Indicators of Illicit Discharges					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	/		/		

ZOHI	_	ge Yard g. 88)		Metal Bldg. 65)	
ACCORDING AND ADDRESS OF THE PARTY OF THE PA	Yes	No	Yes	No	Comments
Personnel Training and Record Keeping		i			
ls a program in place to train employees on pollution prevention and good housekeeping	1		1		
procedures?					
Are employees trained on proper spill prevention and response for the materials that they handle?			/		

Pepco – Benning Road Facility Transformer Storage Monthly Inspection Report

Inspection Date: 13/30/19 Inspection Time: 11:30 am
Inspector: Inspector's Signature: And Inspector's Signature:

MPHI	Transformer Yard			er Lay Down Bidg. 56)	Comments	
	Yes	No	Yes	No		
Good Housekeeping Procedures						
Are outside work areas clean, dry, and free of litter and debris?	1				Myras L Bicked up	
s the area free of potential discharges of leaks and spills?						
Are scrap metal bins free of rust?						
Are catch basins and other inlets in the area to the storm drain system free from debris?	N					
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	1					
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	1					
Are there signs of drainage issue or overflow at any storm drain inlet?		/				
Materials Handling and Storage						
re adequate aisle space and organization in all age areas so that any corrosion or leaks can be detected early?	1					
Are all containers labeled with contents on the appropriate label?						
Are Safety Data Sheets available for all chemical substances?	/					
Are transformers protected from vehicular traffic?	1				Good orginate	
Have all transformers been inspected and are they generally in good condition?	/	-			V V	
If transformers are not in good condition (rusted or leaking) have they been moved indoors or into containment protected from precipitation?	V					
Spill Prevention & Response						
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	1					
Do spill kits contain the proper tools and equipment?	1				Clubd Dk	
Have all spills been properly cleaned up and disposed of properly in the respective area?	\wedge	me				
Other Indicators of Illicit Discharges						
e area clear of any signs of potential illicit canarges such as odors, staining, sheen, residue, etc.?	/					

Pepco – Benning Road Facility

Transformer Storage Monthly Inspection Report

		iormer Ird	Transforme Area (B		Comments
	Yes	No	Yes	No	
Personnel Training and Record Keeping Is a program in place to train employees on pollution prevention and good housekeeping procedures?	V				
Are employees trained on proper spill prevention and response for the materials that they handle?	~				

Pepco – Benning Road Facility Transformer Storage Monthly Inspection Report

Inspection Date: 11/26/19
Inspector: Admin Hat

Inspection Time: 1:30 pm
Inspector's Signature:

MOHI	Transformer Yard			er Lay Down Bldg. 56)	Comments
	Yes	No	Yes	No	
Good Housekeeping Procedures					
Are outside work areas clean, dry, and free of litter and debris?	1				Area looks good
s the area free of potential discharges of leaks and spills?	1				
Are scrap metal bins free of rust?					
Are catch basins and other 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?	1				
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	/				into hole look new
Are there signs of drainage issue or overflow at any storm drain inlet?		1			
Materials Handling and Storage					
re adequate aisle space and organization in all age areas so that any corrosion or leaks can be detected early?	/	ļ			moved 10+ padents
Are all containers labeled with contents on the appropriate label?	/				
Are Safety Data Sheets available for all chemical substances?	/				
Are transformers protected from vehicular traffic?	/	l			
Have all transformers been inspected and are they generally in good condition?	/				
If transformers are not in good condition (rusted or leaking) have they been moved indoors or into containment protected from precipitation?	/				
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?	/				Spill kit cleded
Have all spills been properly cleaned up and disposed of properly in the respective area?	1	MA			
Other Indicators of Illicit Discharges					
e area clear of any signs of potential illicit narges such as odors, staining, sheen, residue, etc.?	/				

Pepco – Benning Road Facility

Transformer Storage Monthly Inspection Report

		ormer rd	Transforme Area (Bl	· ·	Comments
<u> </u>	Yes	No	Yes	No	
Personnel Training and Record Keeping Is a program in place to train employees on pollution prevention and good housekeeping procedures?	1				
Are employees trained on proper spill prevention and response for the materials that they handle?	/				

Pepco – Benning Road Facility Transformer Storage Monthly Inspection Report

Inspection Date: 10/19/19
Inspector: Andro-Hart

Inspection Time: 10 13000 Inspector's Signature:

MOHI	Transformer Yard		I .	er Lay Down Idg. 56)	Comments	
	Yes	No	Yes	No	Comments	
Good Housekeeping Procedures				,,,,		
Are outside work areas clean, dry, and free of litter and debris?		_			Yeach picked v8	
Is the area free of potential discharges of leaks and spills?	1					
Are scrap metal bins free of rust?						
Are catch basins and other 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?	/				septembly resulty	
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?		/				
Materials Handling and Storage						
ere adequate aisle space and organization in all age areas so that any corrosion or leaks can be detected early?	/				some transforms is small	
Are all containers labeled with contents on the appropriate label?	1					
Are Safety Data Sheets available for all chemical substances?	/					
Are transformers protected from vehicular traffic?	/					
Have all transformers been inspected and are they generally in good condition?	/					
If transformers are not in good condition (rusted or leaking) have they been moved indoors or into containment protected from precipitation?	/					
Spill Prevention & Response						
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	/				par a spill kit available	
Do spill kits contain the proper tools and equipment?	/					
Have all spills been properly cleaned up and disposed of properly in the respective area?	na	e				
Other Indicators of Illicit Discharges						
e area clear of any signs of potential illicit charges such as odors, staining, sheen, residue, etc.?	/					
		1	<u> </u>			

Pepco – Benning Road Facility

	Transf Ya		Transforme Area (B		Comments
	Yes	No	Yes	No	
Personnel Training and Record Keeping Is a program in place to train employees on					
pollution prevention and good housekeeping procedures?					
Are employees trained on proper spill prevention and response for the materials that they handle?	/				

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

Status of Stormwater Treatment System

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

As described in prior quarterly status reports, the initial acceptance testing results were inconclusive, but the analytical results of the first and second quarter 2018 sampling at Outfall 013 indicated that the treatment system was not functioning as expected. Pepco has been implementing a Compliance Action Plan prepared by AECOM (the consultant who designed the stormwater treatment system), and submitted to EPA on June 4, 2018, to evaluate the performance of the system, and to identify and implement corrective actions to ensure that the treatment system is functioning as intended to ensure compliance with the NPDES permit limits. The specific actions items were described in the Table 1 of the Plan. The attached Table 1 has been updated to identify the actions taken since the last update was provided to EPA in the third quarter 2019 status report.

A bi-annual O&M inspection of the stormwater treatment system was conducted on October 14, 2019 by our stormwater O&M contractor, iStormwater. This inspection showed the following:

- The Jellyfish units at Hot Spots 1&4 were in good operating condition (these units had been replaced in July 2019)
- The Jellyfish units at Hot Spots 2&3 required maintenance
- The Stormfilters at Hot Spot 1 would need to have their filters replaced at the next biannual inspection (May 2020).
- The Stormfilters in Water Quality Structure (WQS) #3 would need to be replaced.

Based on the October 14, 2019 inspection report, PEPCO had iStormwater replace the Jellyfish filters at Hot Spots 2&3 and the Stormfilters at WQS #3 on November 6, 2019. In addition PEPCO proactively replaced the Stormfilters at Hot Spot #1 on December 20, 2019.

Following a number of adjustments to the stormwater treatment system since its initial installation (as described in prior status reports), during the fourth quarter of 2019 AECOM successfully collected the last complete set of influent and effluent samples from the stormwater treatment system for the initial acceptance testing. The use of automatic ISCO samplers enabled PEPCO, in most cases, to collect samples that are expected to be representative of the stormwater treatment operations and appropriate for assessing

performance of the system components as described in the Stormwater Treatment Measures Design Report. PEPCO expects to receive the final Acceptance Testing Report from AECOM in February 2020 and will submit that report to EPA with a plan for conducting ongoing performance testing.

Stormwater Compliance Action Plan

Pepco Holdings Inc Benning Service Center, Washington D.C. Project number: 60570493

Table 1. Recommended Initial Action Plan (June, 2014 to December, 2018)

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

Pepco Holdings Inc
Benning Service Center, Washington D.C.
Project number: 60570493

Task	Rec	commended ion	Structures	Action items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)
	•	valves are functioning as designed and not impeding flow Flippo inspected the check valves and noted minor debris, but no blockage					check valves at FS-2 and FS-6 on 7/16/18 and 8/3/18, respectively.		
4	Mai •	Rationale: O&M) Rationale: O&M) per manufacturer's recommendations key to system performance Bi-annual O&M inspections by certified CONTECH O&M Contractor, as required by Consent Decree Quarterly visual and physical inspection of treatment structure components Cleaning of accumulated sediment in accordance with O&M manual including after bypass events Replacement of Jellyfish and StormFilter media for proper performance Documentation of O&M activities	Jellyfish, StormFilters, and DownSpout StormFilters	CONTECH/ Pepco/ i- STORMWATER (Pepco's O&M Contractor)	performed two O&M	Following project team meeting on 6/13/18, O&M recommendations from i-STORMWATER were incorporated into the ICA table.	Recommendations have been addressed under Task 1.	Next O&M inspection by i-STORMWATER scheduled for November 2018.	O&M inspection completed by i-STORMWATER November 29, 2018.
5	Inst	Condition pection Rationale: To inspect each treatment structure. Document any conditions or deficiencies impeding treatment.	All	AECOM/ i- STORMWATER/ CONTECH	Completed on 5/15/18. Recommendations from i-STORMWATER are the same as above.	Following project team meeting on 6/13/18, Dry Conditions Inspection recommendations from i-STORMWATER were incorporated into the ICA table.	Recommendations have been addressed under Task 1. Following cleaning/flushing of the storm drain lines, AECOM completed an additional Dry Conditions Inspection on 9/5/18 and 9/06/18, and no issues were noted. In addition, AECOM will lead CONTECH	On 9/21/18, AECOM completed an additional Dry Conditions inspection with CONTECH. CONTECH's observations at most structures identified that (a) Corrective actions by Flippo appear to have been done successfully; (b) Little to no observable flow (as	No update (12/20/18). See new Task 11.

Pepco Holdings Inc
Benning Service Center, Washington D.C.
Project number: 60570493

Task	Recommended Action	Structures	Action items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)
						on an inspection of the systems on 9/21/18.	expected); and (c) No irregularities observed.	
							Additional observations at I68 (Hotspot 2); JF-3A, JF-3B, SF-3A, and SF-3B (Hotspot 3); and JF-4 (Hotspot 4) require further evaluation. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11.	
6	Wet Condition Inspection Rationale: To inspect and observe the functionality of treatment structures during a rain event. Document any conditions or deficiencies impeding treatment.	All	AECOM/ CONTECH/ i- STORMWATER	Completed on 5/18/18. Recommendations from i-STORMWATER are the same as above. Recommendations from CONTECH include: 1. Modifications or repairs at flow splitters to ensure proper flow to treatment system 2. Resealing of structures forebay walls, clearwell walls, and longitudinal wall-to-floor joints. 3. Investigation of potential backwater conditions at StormFilter units 4. Repair leaks at deck fasteners at Jellyfish JF-1. 5. Repair joint leak in weir wall to filter deck at inlet Jellyfish I68. AECOM has collected additional field data to determine necessary adjustments to flow splitters and will document findings in a tech memo	Following project team meeting on 6/13/18, Dry and Wet Conditions Inspection recommendations from i-STORMWATER and CONTECH were incorporated into the ICA table.	Recommendations have been addressed under Task 1. Following cleaning/flushing of the storm drain lines, an additional Wet Conditions Inspection will be scheduled and led by AECOM. This is anticipated to be performed during a qualifying rain event in September 2018.	On 9/17/18 and 9/23/18, AECOM completed additional Wet Conditions inspections. Flow splitters (FS-1, -2, -3, -4, -5, and -6) and Jellyfish structures (JF-1, -3A, -3B, and -4) were observed to be functioning as designed, diverting and treating stormwater. Additional observations made at StormFilter Structures SF-1, -2, -3A, -3B, and -4 will require further evaluation to confirm design stormwater treatment. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11.	No update (12/20/18). See new Task 11.

expected by 6/08/18. Corrective actions

Task	Recommended Action	Structures	Action items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)
				will be implemented as soon as possible thereafter. Additional corrective actions may be identified following completion of Task 1, which includes a full as-built review and hydraulic evaluation.				
7	Clean Jelly Fish Unit Deck Rationale: Per CONTECH, sediment on JF deck could result in erroneous results CONTECH recommends cleaning of deck and backwash pool prior to sampling Sediment accumulates at these locations through grated covers or during bypass flow	Jellyfish	Pepco/ i- STORMWATER	Based on O&M Inspection completed 5/14/18 – 5/18/18 by i-STORMWATER, no cleaning was warranted at the Jellyfish units.	No update (7/6/18).	No update (8/28/18).	Next O&M inspection by i-STORMWATER is scheduled for November 2018.	O&M inspection completed by i- STORMWATER November 29, 2018.
8	Installation of Fixed Sampling Points Rationale: Recommended by CONTECH upon reviewing two rounds of initial acceptance testing results CONTECH recommends fixed, dedicated sample ports and using pumps for sampling CONTECH's approach facilitates collection of more representative treated/untreated samples Based on a call with CONTECH technical staff, AECOM prepared a SOW for this installation	Jellyfish and StormFilters	AECOM/ i- STORMWATER	Completed on 5/29/18.	No update (7/6/18).	Fixed SW sampling points were inspected and blank samples were collected during the Dry Conditions inspection on 9/5/18 and 9/6/18. The SW sampling points were observed to be functioning as intended.	Task completed.	No update (12/20/18).

Stormwater Compliance Action Plan

Task	Recommended Action	Structures	Action items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)
9	Additional Influent and Effluent Sampling Rationale: Evaluate performance of individual treatment system components Results of initial acceptance testing sampling (completed April 2018) may not be representative of system performance due to lack of proper flow to treatment components and difficulty of isolating influent and effluent flows for sampling Additional samples to be collected using new sampling points once corrective actions identified in Tasks 1-8 are implemented.	Jellyfish and StormFilters	AECOM/ CONTECH	To be scheduled for qualifying rain event following completion of Tasks 1-8.	No update (7/6/18).	Tasks 1-8 have been completed. SW Sampling is anticipated to be performed during a qualifying rain event in September 2018.	Based on field observations during wet weather inspections following completion of system modification under Task 1, further evaluation is needed to confirm design stormwater treatment before proceeding with additional influent and effluent sampling. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11.	It is anticipated that additional sampling will be completed following implementation of the proposed optimizations. See new Task 11.
10	Flood Treatment Structures to Rinse Fines Rationale: To rinse filters and underdrains of zeolite dust per CONTECH recommendation Zeolite dust itself has no metals, but could adsorb metals Zeolite dust, if present in effluent, could result in higher effluent concentrations	StormFilters	Pepco/ i- STORMWATER	Need for this task will be reevaluated based on the findings of Tasks 1-9.	. , ,	Tasks 1-8 have been completed. Pepco completed cleaning/flushing of the storm drain lines on 8/31/18.	Task completed.	Pepco completed cleaning/flushing of the storm drain lines on 11/30/18.
11	Evaluation of the Design to Optimize Operation of StormFilter Systems • Re-inspection of stormwater	All	CONTECH/ AECOM	NA	NA	NA	On 10/17/18, CONTECH completed an additional inspection of the StormFilters to confirm equipment	AECOM has completed rerunning the SWMM model for each hotspot based on additional data/information

Stormwater Compliance Action Plan

Pepco Holdings Inc Benning Service Center, Washington D.C. Project number: 60570493

Task	Recommended Action	Structures	Action items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)
						(as of September 7,	(as of October 18,	(as of December 20,
	structures.						for a range of storm events up to maximum system design.	CONTECH.

Table 1. Recommended Initial Action Plan (Jan, 2019 though Jan, 2020)

Tasl	k Recommended Action	Structures	Action items For	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 24, 2020)
1	Review As-built Drawings Rationale: Required by DOEE Stormwater Management Division as part of construction completion; also needed for system evaluation Review, identify missing information and items needing clarification Collect missing information Evaluate potential impact of deviations Identify and implement fixes,	All	AECOM/Flippo	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)	Engaged Princeton Hydro to support investigation of Outfall 101. (10/28/2019)	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)	Engaged Princeton Hydro to support investigation of Outfall 101. (10/28/2019)	Updated site drainage drawing per initial Princeton Hydro 101 work and also feedback from AECOM (contractor supporting stormwater activities). Additional changes anticipated site plan drawing after closure of some Outfall 101 stormwater inlets.
2	if needed CCTV Inspection of Drainage System Rationale: Consent Decree requirement; also needed for system performance evaluation Includes new storm drain lines installed as part of treatment system, but not treatment system components or structures	Site-wide storm drain system	AECOM/Pepco	repair/replacement		Storm drain repair/ replacement work has been completed by Flippo in the first quarter of 2019.	Reviewed CCTV inspection to confirm work scope and will work with Flippo to repair three areas. (10/28/2019)	Priority repair/replacement work as identified by the CCTV inspection was completed on 12/26/2018. Remaining work to be completed in the first quarter 2019.		Storm drain repair/ replacement work has been completed by Flippo in the first quarter of 2019.	Reviewed CCTV inspection to confirm work scope and will work with Flippo to repair three areas. (10/28/2019)	Flippo on-site to walk down repair areas, one area identified as already repaired removed from list. Expect Flippo to perform work within the next few months dependent on weather, work to move equipment in storage yard, and coordination of site traffic as construction will impact a major road through the facility
3	Test Functioning of the Check Valves Rationale: To ensure check valves are functioning as designed and not impeding flow Flippo inspected the check valves	Check valves at HS1 and HS4	Flippo	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)	No update (10/09/19)	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)	No update (10/09/19)	No update

1

and noted minor

Task	Recommended Action	Structures	Action items For	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 24, 2020)
	debris, but no blockage											
4	System Operation &	Jellyfish, StormFilters, and DownSpout StormFilters	STORMWATER (Pepco's O&M	. , ,	No update (02/25/19)	O&M inspection completed by i-STORMWATER May 2019. Based on the findings of the inspection, i-STORMWATER completed replacement of Jellyfish filters at HS#1 and HS#4 on July 26, 2019.	I STORMWATER completed their 2 nd half, 2019 inspection the week of October 14 th .	No update (01/17/19)	No update (02/25/19)	O&M inspection completed by i-STORMWATER May 2019. Based on the findings of the inspection, i-STORMWATER completed replacement of Jellyfish filters at HS#1 and HS#4 on July 26, 2019.	I STORMWATER completed their 2 nd half, 2019 inspection the week of October 14 th .	iStormwater completed maintenance, including cleaning out the stormwater treatment systems, and change out of Jellyfish at Hotspots 2&3 and Stormfilters at WQS #3 on November 6, 2019. In addition the Jellyfish in Hot Spot 1 were proactively change out on December 20, 2019. On-site personnel working with ACV (on-site contractor supporting environmental activities) flushed and cleaned out the catch basins the week of December 17 th , 2019.
5	Dry Condition Inspection Rationale: To inspect each treatment structure. Document any conditions or deficiencies impeding treatment.	All	AECOM/ i- STORMWATER/ CONTECH	No update (01/17/19). See Task 11.	No update (02/25/19). See Task 11.	AECOM completed a preliminary inspection on July 16, 2019 in preparation for installation of the automated samplers by Contech in August 2019.	completed numerous inspections of the storm drain and treatment units during installation of	No update (01/17/19). See Task 11.	No update (02/25/19). See Task 11.	AECOM completed a preliminary inspection on July 16, 2019 in preparation for installation of the automated samplers by Contech in August 2019.		iStormwater completed their inspection of each treatment structure as part of their 2 nd Half 2019 inspection program along with AECOM providing inspections as part of the performance testing completed in November, 2019
6	Wet Condition Inspection Rationale: To inspect and observe the functionality of treatment	All	AECOM/ CONTECH/ i- STORMWATER	No update (01/17/19). See Task 11.	No update (02/25/19). See Task 11.	No update (07/26/19). See Task 11.	No update (10/09/19).	No update (01/17/19). See Task 11.	No update (02/25/19). See Task 11.	No update (07/26/19). See Task 11.	No update (10/09/19).	No update

Tasl	Recommended Action	Structures	Action items For	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 24, 2020)
	structures during a rain event. Document any conditions or deficiencies impeding treatment.											
7	Clean Jelly Fish Unit Deck Rationale: Per CONTECH, sediment on JF deck could result in erroneous results CONTECH recommends cleaning of deck and backwash pool prior to sampling Sediment accumulates at these locations through grated covers or during bypass flow	Jellyfish	Pepco / i- STORMWATER	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)	See Task 4 for i STORMWATER update	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)	See Task 4 for i STORMWATER update	See Task 4 for iStormwater work related to Jelly Fish Unit decks
8	Installation of Fixed Sampling Points Rationale: Recommended by CONTECH upon reviewing two rounds of initial acceptance testing results CONTECH recommends fixed, dedicated sample ports and using pumps for sampling CONTECH's approach facilitates collection of more representative treated/untreated samples Based on a call with CONTECH technical staff, AECOM prepared a SOW for this installation	Jellyfish and StormFilters	AECOM/ i- STORMWATER	No update (01/17/19)	Fixed SW sampling points to be relocated / re-installed for performance testing in first quarter of 2019.	Fixed stormwater sampling points will be re-located / re-installed by Contech during installation of automated samplers in August 2019.	On August 23, 2019, AECOM installed new fixed sampling points at MH33. On August 27 & 28, 2019, AECOM installed 38 ISCO automated samplers at 19 treatment units to collect influent and effluent stormwater sample pairs.	No update (01/17/19)	Fixed SW sampling points to be relocated / re-installed for performance testing in first quarter of 2019.	Fixed stormwater sampling points will be re-located / re-installed by Contech during installation of automated samplers in August 2019.	On August 23, 2019, AECOM installed new fixed sampling points at MH33. On August 27 & 28, 2019, AECOM installed 38 ISCO automated samplers at 19 treatment units to collect influent and effluent stormwater sample pairs.	
9	Additional Influent and Effluent Sampling	Jellyfish and StormFilters	AECOM/ CONTECH	No update (01/17/19). See Task 11.	Additional performance testing will be completed	Additional performance testing will be completed	On August 27 & 28, 2019, AECOM installed 38 ISCO	No update (01/17/19). See Task 11.	Additional performance testing will be completed	Additional performance testing will be completed	On August 27 & 28, 2019, AECOM installed 38 ISCO	The remainder of the influent and effluent sampling points

Task	Recommended Action	Structures	Action items For	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 24, 2020)
	 Rationale: Evaluate performance of individual treatment system components Results of initial acceptance testing sampling (completed April 2018) may not be representative of system performance due to lack of proper flow to treatment components and difficulty of isolating influent and effluent flows for sampling Additional samples to be collected using new sampling points once corrective actions identified in Tasks 1-8 are implemented. 				following re- installation of fixed sampling points.	following installation of automated samplers and reinstallation of fixed sampling points by Contech.	automated samplers at 19 treatment units to collect influent and effluent stormwater sample pairs. Stormwater samples were collected from 17 of the 19 locations and submitted for analysis. This analysis is being evaluated. The remaining 2 locations will be sampled during the next qualifying rain event.		following reinstallation of fixed sampling points.	following installation of automated samplers and reinstallation of fixed sampling points by Contech.	automated samplers at 19 treatment units to collect influent and effluent stormwater sample pairs. Stormwater samples were collected from 17 of the 19 locations and submitted for analysis. This analysis is being evaluated. The remaining 2 locations will be sampled during the next qualifying rain event.	
10	Flood Treatment Structures to Rinse Fines Rationale: To rinse filters and underdrains of zeolite dust per CONTECH recommendation Zeolite dust itself has no metals, but could adsorb metals Zeolite dust, if present in effluent, could result in higher effluent concentrations	StormFilters	Pepco/ i- STORMWATER	No update (01/17/19)	No update (02/25/19)	No update (7/26/19)	No update (10/09/19)	No update (01/17/19)	No update (02/25/19)	No update (7/26/19)	No update (10/09/19)	No update
11	Evaluation of the Design to Optimize Operation of StormFilter Systems Re-inspection of stormwater treatment units and components to confirm	All	CONTECH/ AECOM	Contech agreed with the adjustments proposed by AECOM and proposed additional adjustments to improve flow management at SF 4. No additional optimizations are	implementation of	AECOM will oversee the installation of automated samplers by Contech at the 38 individual treatment structures during August 2019. The automated samplers will be programmed to collect influent and	2019, ĀECOM installed 38 ISCO automated samplers at 19 treatment units to collect influent and effluent stormwater sample pairs.	Contech agreed with the adjustments proposed by AECOM and proposed additional adjustments to improve flow management at SF 4. No additional optimizations are	implementation of	AECOM will oversee the installation of automated samplers by Contech at the 38 individual treatment structures during August 2019. The automated samplers will be programmed to collect influent and	at 19 treatment units to collect influent and effluent stormwater sample pairs. Stormwater samples	The fourth quarter EPA NPDES consent decree status report Section 68.a.5 includes an update on the status of the acceptance testing

Task Recommended Structures Action items Action For	Status Status (as of January 17, (as of February 25, 2019)	Status (as of July 26, 2019) (as of October 28, 2019)	Status Status (as of January 17, 2019) Status 2019)	Status , (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 24, 2020)
equipment type and configuration. Investigate water quality inflows to each hot spot treatment unit Initial routing calculations for each structure Rerun the SWMM model to include the Jellyfish filter and StormFilter treatment structures. Design modifications (if necessary) Check the hydraulic grade line (HGL) for water quantity flows. Review data and develop potential options to optimize performance at these treatment structures.	recommended by Contech at this time to achieve design treatment. Per the SWMM, AECOM prepared the following adjustments to optimize system performance: • HS1 (SF1) is receiving greater than 100% of the design storm first-flush for treatment. No further adjustments are proposed. • HS2 (SF2) is currently receiving greater than 90% of design storm first-flush for treatment. Raising of weir walls at FS3 and FS4 is proposed to optimize the volume of stormwater that is being redirected for treatment. • HS3 (SF3A & SF3B) are currently receiving greater than 90% of a design storm first-flush for treatment. • HS3 (SF3A & SF3B) are currently receiving greater than 90% of a design storm first-flush for treatment. Raising the weir vall at FS5 were raised to optimize the volume of stormwater added to JF3A & JF3B to optimize the volume of stormwater added at JF4, and the overflow cartridges were added at JF4, and the overflow assembly invert at SF4 was raised to optimize the volume of stormwater redirected for treatment. At HS4- the weir wall at FS6 was raised, the flow restrictor plates to JF3A & JF3B to optimize the volume of stormwater redirected for treatment. At HS4- the weir wall at FS6 was raised, the flow restrictor plates to JF3A & JF3B to optimize the volume of stormwater redirected for treatment. At HS4- the weir wall at FS6 was raised, the flow restrictor plates to JF3A & JF3B to optimize the volume of stormwater redirected for treatment. At HS4- the weir wall at FS6 was raised, the flow restrictor plates to JF3A & JF3B, and added to JF3A & JF3B to optimize the volume of stormwater redirected for treatment. At HS4- the weir wall at FS6 was raised, the flow restrictor plates to JF3A & JF3B to optimize the volume of stormwater redirected for treatment. At HS4- the weir wall at FS6 was raised, the flow restrictor plates to JF3A & JF3B, and adding MAW extensions to JF3A & JF3B are proposed to optimize the volume of stormwater redirected for treatment.		recommended by Contech at this time to achieve design treatment. Per the SWMM, AECOM prepared the following adjustments to optimize system performance: • HS1 (SF1) is receiving greater than 100% of the design storm first-flush for treatment. No further adjustments are proposed. • HS2 (SF2) is currently receiving greater than 90% of design storm first-flush for treatment. Raising of weir walls at FS3 and FS4 is proposed to optimize the volume of stormwater that is being redirected for treatment. • HS3 (SF3A & SF3B) are currently receiving greater than 90% of a design storm first-flush for treatment. • HS3 (SF3A & SF3B) are currently receiving greater than 90% of a design storm first-flush for treatment. • HS3 (SF3A & SF3B) are currently receiving greater than 90% of a design storm first-flush for treatment. Raising the weir wall at FS5, removing flow restrictor plates to JF3A & JF3B, and adding MAW extensions to JF3A & JF3B are proposed to optimize the volume of stormwater that is being redirected for treatment.	samples during a qualifying storm event once treated stormwater is discharged from a treatment structure. In addition, fixed sampling points will be re-installed as needed by Contech.	17 of the 19 locations and submitted for analysis. This analysis is being evaluated.	

stormwater that is being

stormwater that

is being

Task Recommended Action	Structures	Action items For	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)	Status (as of October 28, 2019)	Status (as of January 24, 2020)
			redirected for treatment. HS4 (SF4) is currently receiving greater than 80% of a design storm first-flush for treatment. Raising the weir wall at FS6, adding hiflow cartridges at JF4, and raising the overflow assembly invert at SF4 is proposed to optimize the volume of stormwater that is being redirected for treatment.				redirected for treatment. HS4 (SF4) is currently receiving greater than 80% of a design storm first-flush for treatment. Raising the weir wall at FS6, adding hiflo cartridges at JF4, and raising the overflow assembly invert at SF4 is proposed to optimize the volume of stormwater that is being redirected for treatment.				

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

Stormwater Management Training

The attached list includes the names of the employees working at Benning who received the Stormwater Management Training during the period from October through December 2019.

Pepo Environmental Storm Water Pollution Prevention Plan (EST) 11/19/2019 11:30 Mohller Michael 7604 PRP OR Hain & Construct-Fore Pepo Environmental Storm Water Pollution Prevention Plan (EST) 10/1/2019 11:33 Mills Brid on Steven 7604 PRP Pepo Transmission Planning Pepo Environmental Storm Water Pollution Prevention Plan (EST) 10/1/2019 13:34 Simmons Cyrchia 10 Jin 2019 13:32 Mills Propo Previous Prevention Plan (EST) 10/1/2019 13:34 Simmons 7600 PRP Pepo Reventment Affairs-Pepo Pepo Pepo Printing Prevention Plan (EST) 10/1/2019 13:34 Simmons 10 Pepo Environmental Storm Water Pollution Prevention Plan (EST) 10/1/2019 13:34 Simmons 10 Pepo Environmental Storm Water Pollution Prevention Plan (EST) 10/1/2019 13:43 Evals 8 Pep Pep Pep Pep Pep Pep Pop Pop Pin Mill As Construct-Fore Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 10/1/2019 13:43 Evals 8 Pep Pep Pep Pep Pep Pep Pep Pop Pin Mill As Construct-Rockwill Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 10/1/2019 13:13 Evals 8 Pep	Description	Completion Date L	Last Name	First Name	Middle Initial	Org ID Org Desc
Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/2019 13:21 Willis 101/2019 16:27 Robinson Marc C 76:010 PFP Pepos Program Affairs-Pepos Pepos Furincendal Storm Water Pollution Prevention Plan (CBT) 101/2019 16:27 Robinson Marc C 76:010 PFP Pepos Regional Business Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/70/19 16:27 Robinson William W 76:014 PFP Pepos Regional Business Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/70/19 16:28 Reynolds William W 76:014 PFP Pepos Off Main & Construct-Fore Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/70/19 18:39 News Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/70/19 18:39 News Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Theresa Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Theresa Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Theresa Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Theresa Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Theresa Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Theresa Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Theresa Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Theresa Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Pepos Environmental Storm Water Pollution Prevention Plan (CBT) 101/71/19 18:40 Gaboriaut Pepos Environmental Storm Water Pollution Prevention Plan	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/19/2019 11:30 N	Mohler	Michael		76043 PEP OH Main & Construct-Fore
Pages Derivinamental Storm Water Pollution Prevention Plan (EST) Jol/12039 13:45 Simmons Cyrithis Oak 7600H PEP Government Affairs Pegos Pages De Invironmental Storm Water Pollution Prevention Plan (EST) 10/1/2019 14:54 McLaughiln Samuel ice 76003 PEP OH Main & Construct-Fore Pages De Invironmental Storm Water Pollution Prevention Plan (EST) 10/1/2019 18:34 McLaughiln William W 76043 PEP OH Main & Construct-Fore Pegos Derivinomental Storm Water Pollution Prevention Plan (EST) 10/1/2019 18:03 McCartity Pagu Food 4PEP Pegos OH Main & Construct-Fore Pegos Derivinomental Storm Water Pollution Prevention Plan (EST) 10/1/2019 19:09 Bic David 76044 PEP Pegos OH Main & Construct-View Pegos Derivinomental Storm Water Pollution Prevention Plan (EST) 10/1/2019 19:09 Bic David 76044 PEP Pegos OH Main & Construct-View Pegos Derivinomental Storm Water Pollution Prevention Plan (EST) 10/1/2019 11:06 Davis Jol/2019 11:06 Davis Pegos Derivinomental Storm Water Pollution Prevention Plan (EST) Jol/2019 11:12 Davis Regina Marthew 76044 PEP Pegos OH Main & Construct-View Pegos	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 12:56 0	Omoijuanfo	Steven		76046 PEP Relay
Pepos Environmental Storm Water Pollution Prevention Plan (CBT)	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 13:31 V	Willis	Brian	0	76029 PEP Pepco Transmission Planning
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 13:54 S	Simmons	Cynthia	Diane	76004 PEP Government Affairs-Pepco
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Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/16/2019 13:12 Bastianelli Christopher Michael 76043 PEP OH Main & Construct-Fore Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:24 Trieschman Christopher Lee 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:24 Trieschman Christopher Lee 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:48 Moon Sirron Alonzo 76045 PEP UG Maint & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:48 Moon Sirron Alonzo 76045 PEP UG Maint & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:59 Sapp Jeffery 76043 PEP OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 11:30 Thames Cameron 76045 PEP UG Maint & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 12:46 Ruby Sr James E 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 13:53 Hayghe Joshua 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:43 Goggin Joseph Martin 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:54 Bingel Birian Joseph 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:58 Bingel Birian Joseph 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:58 Bingel Birian Joseph 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:58 Curtin Richard William 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:58 Gurtin Richard William 76044 PEP Pepco OH Main & Construct Pepco	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/16/2019 12:52 S	Slayton	Jason	L.	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/16/2019 13:33 Gerondakis Stephen P 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:24 Trieschman Christopher Lee 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:48 Moon Sirron Alonzo 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:48 Moon Sirron Alonzo 76045 PEP UG Maint & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:59 Sapp Jeffery 76043 PEP OH Main & Construct-Fore Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 11:30 Thames Cameron 76045 PEP UG Maint & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 11:30 Thames E 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 13:53 Hayghe Joshua 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 13:53 Hayghe Joshua 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:43 Goggin Joseph Martin 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:54 Bingel Brian Joseph 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:58 Curtin Richard William 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 15:04 Anderson-Bailey Tracy 79114 PSC Quality Monitoring Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 17:04 Anderson-Bailey Tracy 79114 PSC Quality Monitoring Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 17:04 Anderson-Bailey Tracy 79114 PSC Quality Monitoring Pepco Environmen	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/16/2019 12:53 S	Strong	Austin	R.	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/16/2019 13:33 Gerondakis Stephen P 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:24 Trieschman Christopher Lee 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:48 Moon Sirron Alonzo 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:48 Moon Sirron Alonzo 76045 PEP UG Maint & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 10:59 Sapp Jeffery 76043 PEP OH Main & Construct-Fore Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 11:30 Thames Cameron 76045 PEP UG Maint & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 11:30 Thames E 76044 PEP Pepco OH Main & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 13:53 Hayghe Joshua 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 13:53 Hayghe Joshua 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:43 Goggin Joseph Martin 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:54 Bingel Brian Joseph 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 14:58 Curtin Richard William 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 15:04 Anderson-Bailey Tracy 79114 PSC Quality Monitoring Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 17:04 Anderson-Bailey Tracy 79114 PSC Quality Monitoring Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/3/2019 17:04 Anderson-Bailey Tracy 79114 PSC Quality Monitoring Pepco Environmen	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/16/2019 13:12 B	Bastianelli	Christopher	Michael	76043 PEP OH Main & Construct-Fore
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Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water Pollution Prevention Plan (CBT	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/16/2019 13:34 T	Terry	Joshua		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water Pollution Prevention Plan (CBT	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/3/2019 10:48 N	Moon	Sirron	Alonzo	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water Pollution Prevention Plan (CBT	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/3/2019 10:59 S	Sapp	Jeffery		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water Pollution Prevention Plan (CBT	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/3/2019 11:30 T	Thames	Cameron		76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water Pollution Prevention Plan (CBT		10/3/2019 12:46 R	Ruby Sr	James	E	76044 PEP Pepco OH Main & Constr-Rockvil
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Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water Pollution Prevention Plan (CBT	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/16/2019 15:01 K	KC	BIKU		76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water Pollution Prevention Plan (CBT	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)			Joseph	Martin	
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water	·	10/3/2019 14:54 B	Bingel	-	Joseph	•
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water	•	10/3/2019 14:58 0	Curtin	Richard	•	•
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)			Justin		•
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) Pepco Environmental Storm Water	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/3/2019 17:04 A	Anderson-Bailey	Tracy		79114 PSC Quality Monitoring
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/4/2019 10:20 Harrity Edward R 76044 PEP Pepco OH Main & Constr-Rockvil Thomas J 76044 PEP Pepco OH Main & Constr-Rockvil			•	•		
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/4/2019 10:20 Harrity Edward R 76044 PEP Pepco OH Main & Constr-Rockvil Thomas J 76044 PEP Pepco OH Main & Constr-Rockvil	·	• •	•			
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/4/2019 10:20 Harrity Edward R 76044 PEP Pepco OH Main & Constr-Rockvil Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/4/2019 10:21 Harwood Thomas J 76044 PEP Pepco OH Main & Constr-Rockvil	·			•	J	·
Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/4/2019 9:41 Thompson Allen C 76045 PEP UG Maint & Construct Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/4/2019 10:20 Harrity Edward Pepco Environmental Storm Water Pollution Prevention Plan (CBT) 10/4/2019 10:21 Harwood Thomas J 76044 PEP Pepco OH Main & Constr-Rockvil	·			Jeffrev	М	
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Pepco Environmental Storm Water Poliution Prevention Plan (CBT) 10/4/2019 10:32 Fernandes Nichole K Oliver /9134 PSC Cust Rei Research & Resolution	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/4/2019 10:32 F		Nichole	R Oliver	79134 PSC Cust Rel Research & Resolution

Description	Completion Date Last	Name First Name	Middle Initial	Org ID Org Desc
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/4/2019 10:44 Jilan	ni Ahmad		76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/4/2019 10:56 Cant	tin Shawn		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/4/2019 11:10 Alexa	kander Jr Stephen	Wayne	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/4/2019 11:21 Butle	ler Phillip		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/4/2019 11:24 Sloar	n Timothy	Allen	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/4/2019 11:29 Mora	ran III John B.		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/17/2019 8:53 Brow	wn Marcus		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/4/2019 12:50 Good	odman Michael	С	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/6/2019 18:27 Bake	er II Christopher	W	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/7/2019 6:44 Tarb	orake Kevin	J	76047 PEP Sub Construction & Maint
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/7/2019 9:30 Gebe	eyehu Abate		76097 PEP Telecommunications
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/7/2019 9:30 Gree	en Anthony	D	76075 PEP PEPCO Severances
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/7/2019 9:32 Ruby	y John		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/7/2019 12:47 Coop	per Chad		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/7/2019 12:53 Dono	oughe Jeffery	Thomas	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/7/2019 13:01 McS	Sweeney Michael		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/7/2019 14:04 Smal	allwood James		76049 PEP Mobile Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 7:41 Max	kwell Richard		76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/17/2019 13:31 Sturr	m Hiedi	F.	76008 PEP Pepco Environmental Ops
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 9:31 Gree	en-Baker Jennifer		76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 10:11 Mos	ses Roderick	Cecil	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 11:00 Lade	era Jaime	Aganinta	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 11:14 Whit	itfield George	L	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 11:20 Noel	el Quentin	Lamar	79007 PSC PHI Regulatory
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 11:26 Arch	ner Richard	Α	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/17/2019 14:47 Nels	son Wykaine	L	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 13:07 Ump	phries Eric	Wayne	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 15:03 Frazi	zier Tony	Odessie	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/8/2019 17:57 Ellis	Kenneth		76039 PEP Customer Relations Research &
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 8:00 Sann	ner Steven	Wesley	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 9:08 Law	Antoin	D	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 9:25 St Ar	ndre Victor		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 9:26 Bren	nt Cendel	Α	76048 PEP Pepco-System Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 10:26 Buza	ard David	J	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 10:27 Watl	tkins Nighesti	R	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 12:47 Sant	taiti Brian		76047 PEP Sub Construction & Maint
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 11:02 Felix	x Rodney		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 12:39 Mitc	chell Erik	Stratton	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/9/2019 13:27 Sanz	zone Gary	Anthony	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/10/2019 12:25 Turn	ner Kenneth		76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 8:11 O'Br	rien George	G	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 8:20 Grun	_		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 8:58 Battl	tle Marc	K	76004 PEP Government Affairs-Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 9:56 Jone	es Oshane		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 6:17 Aller	n Linda	Α	76050 PEP Meter Services

Description	Completion Date	Last Name	First Name	Middle Initial	Org ID Org Desc
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 7:38	Williams	Sherita		76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 8:04	Goodwin	Tracey	Thaddeus	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 8:23	Stone	Krystle		79121 PSC Meter Data Analysis Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 8:25	Birgane	Yacob		76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 8:32	Watson	Alaura		76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 8:36	Mitchell	Robert		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 9:45	Whitfield	George	L	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 10:04	O'donnell	Sean	Р	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/1/2019 11:12	Potts	William		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:15	Thomas	Dana	Eddie	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:18	Ellis	Eric		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:18	Lancaster	Gabriel	Andreas	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:27	White	London		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:29	sloley	kevin	J	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:29	Ayers	Joshua	M.	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:29	CARTHEN	REGINALD		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:30	Lotharp	Jesse	Lee	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 10:30	Taylor	Justin	Daniel	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 11:14	Diaz	Jairo	Eliezer	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 11:20	King	Russell		76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 13:00	Sindall	Andrew	Christian	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 13:01	George	Daniel	Joseph	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 13:13	Hose	Philip		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/10/2019 13:21	Hodge	Keith		76016 PEP Pepco Fleet
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/11/2019 8:45	Scott	Randy	Allen	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/11/2019 13:11	Gardner	Jonathan		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/14/2019 9:05	McCormack	Nicholas		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/14/2019 11:04	Rice	Steven	V	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/15/2019 6:36	Mason Jr	Thomas	W	76047 PEP Sub Construction & Maint
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/18/2019 12:59	Bowley	Justin	Andrew	76089 PEP Pepco Construction Mgmt
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/21/2019 8:46	Spadaro	Anthony		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/21/2019 11:57	Reed	Arthur	W	76075 PEP PEPCO Severances
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/21/2019 13:33	Franklin	Crystal	L	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/21/2019 14:14	Vaddy	Roberto	Velyn	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/21/2019 17:39	Bladen	Lisa	L	76027 PEP Pepco Key Account Management
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/21/2019 22:27	Harmon	Shirley	Н	76008 PEP Pepco Environmental Ops
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/22/2019 8:18	Austin	Jerry		76014 PEP Stores Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/22/2019 11:30	Vargas	Javier		75017 ACE System Operations -ACE Region
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/22/2019 13:41	King	Janai		76038 PEP Customer Care Billing-Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/22/2019 14:02	Stuckey	Edward	Α	76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/23/2019 9:48	Katzenmaier	Glen	Α	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/23/2019 15:59		Myrlene		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/24/2019 8:08		Philip		76025 PEP Pepco Drafting
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/24/2019 10:09		Edward	Charles	79103 PSC T&D Automation
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/24/2019 10:21	Chuk	Shuk Yin		76013 PEP AM Project Management - Pepco

Description	Completion Date Last Name	First Name	Middle Initial	Org ID Org Desc
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/24/2019 11:40 Foster	Kelay	Lawan	76038 PEP Customer Care Billing-Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/24/2019 14:17 Koirala	Ashutosh		76013 PEP AM Project Management - Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/24/2019 16:31 Laatabi	Nacer		76028 PEP Pepco Substation Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/24/2019 19:57 McDougal	Benita	D	76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/25/2019 11:46 Kidane	Yemane	Amdemariam	76009 PEP DC Power Line Undergrounding (
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/28/2019 8:08 Welch	Christina	Marie	76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/28/2019 9:24 Foster	Kelay	Lawan	76038 PEP Customer Care Billing-Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/28/2019 9:41 Greathouse	Stephen	Wayne	76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/28/2019 16:38 Culpepper	Travoris		76004 PEP Government Affairs-Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/28/2019 20:12 Harvard	Joyce	В	76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/29/2019 12:05 Hernandez	Luis	F	76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/29/2019 19:26 Black	Mary	Ann	76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/29/2019 23:10 Merkel	Dane	G	79037 PSC Training and Procedures
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/30/2019 11:24 Saeed	Awais	Bin	79109 PSC Transmission Engineering - PHI
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/30/2019 16:23 Mukhar	Ferdinand		76089 PEP Pepco Construction Mgmt
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/31/2019 7:26 Rogers	David	Α	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/31/2019 8:58 English	Joshua	Allan	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/31/2019 9:32 Pasternak	Jerald		76004 PEP Government Affairs-Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/31/2019 9:33 Kenner	Lisa	Delores	76097 PEP Telecommunications
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/31/2019 12:08 Cropp	Tracee	N	76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/31/2019 12:22 Stevenson	Adora		76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	10/31/2019 12:30 German	Howard		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/1/2019 9:48 Love	Tracy	Katharine	76040 PEP Billing CRT
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/1/2019 9:52 Thompson	Kisha	R	76037 PEP Credit & Collections-Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/1/2019 11:21 Ordona	Jose	R	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/2/2019 1:10 Wiese	Gregory	J	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/3/2019 19:24 Hiruy	Elias	Berhane Meskel	76013 PEP AM Project Management - Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/5/2019 10:11 Creek Jr	Joseph		76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/5/2019 12:34 Boone	Reginald		76047 PEP Sub Construction & Maint
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 7:45 Bowen	Walter	Α	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 7:54 Nicholson	John	D	76100 PEP Transformer Shop Dist
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 9:08 Rank	Robert	K	76047 PEP Sub Construction & Maint
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 9:29 Forbes	Joseph		76014 PEP Stores Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 9:48 Miller	Vivian A	K	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 13:06 Colbert	Brandon	Allen	76039 PEP Customer Relations Research &
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 13:12 Colbert	Brandon	Allen	76039 PEP Customer Relations Research &
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 13:13 Colbert	Brandon	Allen	76039 PEP Customer Relations Research &
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/6/2019 14:49 Kelly	Kimberly	White	76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/7/2019 12:19 Randolph	Anthony	Α	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/7/2019 18:31 Tolar	Cheryl	F	76075 PEP PEPCO Severances
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/7/2019 18:32 Middleton	Lee		76049 PEP Mobile Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/7/2019 21:54 Han	Jungyu		76049 PEP Mobile Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/8/2019 9:38 Petty	Edward	G	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/8/2019 13:01 Nalls	Jeffrey	Allen	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/8/2019 13:28 Gardner	Emma	Elizabeth	76050 PEP Meter Services

Description	Completion Date Last Name	First Name	Middle Initial	Org ID Org Desc
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/8/2019 15:01 Harrell	Michael		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/8/2019 15:09 Saavedra Villanueva	Juan	E.	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/9/2019 8:54 Baskin	Leslie	W	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/9/2019 13:40 Willis	Brian		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/10/2019 17:43 Mathes	Nathaniel	С	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/11/2019 8:19 Nicholson Jr	Richard	W	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/11/2019 10:19 Reichert	Anthony		76100 PEP Transformer Shop Dist
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/11/2019 11:09 Warren	Terri	L	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/11/2019 12:43 Gebremichael	mintesnot	T	76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/11/2019 18:03 Jefferson	Linda	D	76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 7:53 Brantley	Stephen		76048 PEP Pepco-System Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 7:58 Stansbury Jr	William	0	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 9:05 Hostetter	Ernest	R	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 9:09 Wells III	James		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 9:46 Luna	Gabriel	С	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 10:35 Mogus	Thomas	Α	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 10:46 Carter	Brett		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/12/2019 10:46 Griffith	Linda	D	76201 PEP PEPCO-REF Facility Mgmt
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/13/2019 6:33 Friedland	Jeffrey		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/13/2019 7:44 Parker	Robert	С	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/13/2019 8:11 Macpherson Banning	Christopher		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/13/2019 9:59 Ball	Donald	L	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/13/2019 11:26 Cecil	Sean	L	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/13/2019 12:59 Richardson	Loretta	Lea	76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/14/2019 7:56 Manley	Temika		79117 PSC Retail Choice & Syst
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/14/2019 8:20 Simon	Mewael	T	76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/14/2019 8:55 Saini	Rohit		76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/14/2019 8:57 Groff	Travis	R	76025 PEP Pepco Drafting
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/14/2019 9:26 Jessup	Benjamin	Stern	79109 PSC Transmission Engineering - PHI
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/14/2019 10:32 Mehta	Chaitali	Tejas	76047 PEP Sub Construction & Maint
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/14/2019 11:31 Lockhart	Tyrone	J	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/14/2019 13:52 Burton	Michael	Sean	76201 PEP PEPCO-REF Facility Mgmt
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/15/2019 8:44 Cook	Roberta	L	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/15/2019 15:53 Abate	Zufan		76022 PEP Pepco-Safety
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/15/2019 16:27 Moyer Jr	Jesse		76019 PEP Customer Operations
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/18/2019 11:28 Nicholson	John	D	76100 PEP Transformer Shop Dist
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/18/2019 12:29 White	Kriss		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/18/2019 13:19 Tatem	Eric	Martinez	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/18/2019 13:33 Wratten	Kyle	Martin	76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/18/2019 17:28 Doherty	Brian		76001 PEP Regulatory Services - Pepco
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/20/2019 12:19 Hunter	Yolanda	M	76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/20/2019 12:53 Toms	Carl	Α	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/20/2019 13:46 Little	April		76021 PEP Pepco Engineering
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/20/2019 14:26 Giron	Jose	1	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/21/2019 9:06 Norell	Michael	Dean	76097 PEP Telecommunications

Pepos Centrommental Storm Water Follution Prevention Plan (CST) 12/12/2019 31.00 Group 12/	Description	Completion Date Last Name	First Name Middle Initia	l Org ID Org Desc
Pepus Chrisrommental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 8:33 Brown Richard Merkin 76005 PEP Media: Revenues Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 8:33 Brown Dwayne A 76005 PEP Media: Revenues Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 8:33 Brown Dwayne A 76005 PEP Media: Revenues Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:30 Brown Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:30 Statutor Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Statutor Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Statutor Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Statutor Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Statutor Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Statutor Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Statutor Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9:33 Stallings Pepus Chrisromental Storm Water Pollution Prevention Plan (CBT) 1/27/2019 9	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/21/2019 10:03 Chu	Jack S	76021 PEP Pepco Engineering
Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11725/2019 9:73 Davis Richard Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11725/2019 9:75 Trons Anthony Michael 76043 PEP OH Main & Construct-Fore Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11725/2019 9:10 Trons Anthony Michael 76043 PEP OH Main & Construct-Fore Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11725/2019 10:20 Ringsins Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11725/2019 9:23 Sturch Linda D 76047 PEP Sub-Construction & Maint Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11727/2019 9:33 Sturch Linda D 76047 PEP Sub-Construction & Maint Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11727/2019 9:33 Sturch Linda D 76047 PEP Sub-Construction & Maint Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11727/2019 9:33 Sturch Linda D 76049 PEP Out Maint & Construct-Fore Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11727/2019 9:33 Sturch Linda D 76019 PEP Out Maint & Construct-Fore Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11727/2019 9:34 Sturch Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11727/2019 9:34 Sturch Popo Environmental Storm Water Pollution Prevention Plan (ERT) 11727/2019 9:34 Sturch Popo Environmental Storm Water Pollution Prevention Plan (ERT) 1277/2019 9:34 St. Thomas Popo Environmental Storm Water Pollution Prevention Plan (ERT) 1277/2019 9:34 St. Thomas Popo Environmental Storm Water Pollution Prevention Plan (ERT) 1277/2019 9:32 St. Thomas Popo Environmental Storm Water Pollution Prevention Plan (ERT) 1277/2019 9:32 St. Thomas Popo Environmental Storm Water Pollution Prevention Plan (ERT) 1277/2019 9:32 St. Thomas Popo Environmental Storm Water Pollution Prevention Plan (ERT) 1277/2019 9:22 St. Thomas Popo Environmental Storm Water Pollution Pr	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/21/2019 10:30 Benson	Walter	76044 PEP Pepco OH Main & Constr-Rockvil
Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/25/2019 8-23 B rown Nicholar Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/25/2019 10:20 Rigglins Reneth J 76030 PFP Meter Services Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/25/2019 10:20 Rigglins Reneth J 76030 PFP Meter Services Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/25/2019 13:23 B lunch Linda D 76040 PFP Government Affairs-Pepco Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:35 B lunch Linda D 76040 PFP Government Affairs-Pepco Pepco Penvironmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:35 S lunch Linda D 76040 PFP Government Affairs-Pepco Pepco Penvironmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:35 S lunch Linda D 76040 PFP Government Affairs-Pepco Pepco Penvironmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:36 S lawara Sheku 76011 PFP Pepco Penvironmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:36 S lawara Sheku 76013 PFP AM Project Affairs P 76019 PFP Continuer Pepco Penvironmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:36 S lungs Ryon 76045 PFP LU Maint & Construct-Fore Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:46 T lunch Plan Ryon 76045 PFP LU Maint & Construct-Fore Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:46 T lunch Plan Ryon 76045 PFP LU Maint & Construct-Fore Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:40 S lunch Ryon 76045 PFP LU Maint & Construct-Fore Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:25 S lunch Ryon 76045 PFP LU Maint & Construct-Fore Pepco Environmental Storm Water Pollution Prevention Plan (CRIT) 11/27/2019 13:25 Miller Miller 76049 PFP Ollution Prevention Plan (Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/21/2019 13:16 Turner	Kenneth	76050 PEP Meter Services
Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/25/2019 9:57 Torres Anthony Michael 76049 PEP OH Main & Construct-Fore Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/25/2019 14.22 Kowansky III Paul P 76049 PEP Sub-Construction & Maint Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/25/2019 14.22 Kowansky III Paul P 76049 PEP Sub-Construction & Maint Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/25/2019 13.59 Bunch Lindy D 76049 PEP Sub-Construct-Fore Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Jawara Sheku 76014 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Jawara Sheku 76014 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Jawara Sheku 76014 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Jawara Sheku 76014 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Thomas Samon D 76012 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Thomas Samon D 76012 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Thomas Samon D 76012 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Thomas Samon D 76012 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Thomas Samon D 76012 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Thomas Samon D 76012 PEP Pepo Engineering Pepo Environmental Storm Water Pollution Prevention Plan (CBT) 11/27/2019 13.46 Thomas Samon D 76012 PEP Pepo Engineering Pepo Environmental Storm Water Polluti	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/22/2019 7:33 Davis	Richard Melvin	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (C8T) 11/25/2019 16.22 Royanshy Paul P	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/25/2019 8:33 Brown	Dwayne A	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (C8T) 11/25/2019 16.22 Royanshy Paul P	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/25/2019 9:57 Torres	Anthony Michael	76043 PEP OH Main & Construct-Fore
Pape	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/25/2019 10:20 Riggins	Kenneth J	76050 PEP Meter Services
Pepo Environmental Storm Water Pollution Prevention Plan (GRT)	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)		Paul P	76047 PEP Sub Construction & Maint
Pepoc Environmental Storm Water Pollution Prevention Plan (CBT)	·	•	Linda D	76004 PEP Government Affairs-Pepco
Pepoc Environmental Storm Water Pollution Prevention Plan (CBT)	Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	11/27/2019 8:39 Nurse	Lloyde Philip	76043 PEP OH Main & Construct-Fore
Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 11/32/(2019 19:30 Waller Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 11/32/(2019 9:33 Stallings Ryon 76045 PEP UG Maint & Construct Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/2/(2019 9:33 Stallings Ryon 76045 PEP UG Maint & Construct Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/2/(2019 13:46 Thomas Samon D 76021 PEP Pepoc Engineering Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/2/(2019 13:46 Yanovasida Jr Roda Samon D 76021 PEP Pepoc Engineering Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/3/(2019 13:46 Yanovasida Jr Roda Storm Water Pollution Prevention Plan (EST) 12/3/(2019 13:46 Yanovasida Jr Roda Storm Water Pollution Prevention Plan (EST) 12/3/(2019 13:26 Roache Bryson 79121 PSC (Claims and Damage Prevention Plan (EST) 12/3/(2019 13:26 Roache Bryson 76045 PEP UG Maint & Construct Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 11:26 Janovas Samon W 76045 PEP UG Maint & Construct Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 11:26 Janovas Samon W 76045 PEP UG Maint & Construct Fore Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 8:28 Sehrt Gary 76043 PEP OH Main & Construct-Fore Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 8:28 Sehrt Gary 76043 PEP OH Main & Construct-Fore Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 8:28 Sehrt Gary 76043 PEP OH Main & Construct-Fore Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 9:35 Beck Tyler 76043 PEP OH Main & Construct-Fore Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 9:35 Beck Tyler 76043 PEP OH Main & Construct-Fore Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 9:35 Beck Tyler Water Pepoc Environmental Storm Water Pollution Prevention Plan (EST) 12/4/(2019 9:35 Beck Tyl		11/27/2019 9:53 Santmyer	James E	76043 PEP OH Main & Construct-Fore
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Description	Completion Date Last Name	First Name	Middle Initial	Org ID Org Desc
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/19/2019 15:18 Sargeant	Selwyn		76043 PEP OH Main & Construct-Fore
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/20/2019 8:18 Brown Jr	James	R	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/20/2019 14:01 Gilger	Keith	Edward	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/23/2019 8:47 Dupre	Varcasy	None	79040 PSC Construction Management
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/23/2019 13:32 Harris	Dakari		76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/26/2019 9:47 Robinson	Delonte	C.	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/26/2019 10:32 Chin	Ming Deng		76096 PEP Pepco Civil
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/26/2019 11:47 Dinsmore	Timothy	В	76008 PEP Pepco Environmental Ops
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/26/2019 13:50 Jones	Ryan	Lt	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/26/2019 15:09 Groves	Ernest	Franklin	76050 PEP Meter Services
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/26/2019 15:21 Schade	Kyle		76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/27/2019 10:37 Coats	Loni	Monteal	76083 PEP Pepco Work Management
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/27/2019 13:11 Proctor	Keith	Α	76045 PEP UG Maint & Construct
Pepco Environmental Storm Water Pollution Prevention Plan (CBT)	12/30/2019 7:20 Chick	Timothy	Joseph	76043 PEP OH Main & Construct-Fore

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

Stormwater Pollution Prevention Plan

No changes to the Stormwater Pollution Prevention Plan have been made since the last update in September 2019.

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

Change in Management Responsibilities

There were no changes in management responsibility in the 4th quarter, 2019.

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

Status of Completion of Transformer Storage Shed

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

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

Status of Stormwater Retention Project

As reported in the 2018 second quarter status report, Pepco determined that the Stormwater Retention Project described in Section VIII of the Consent Decree was not technically feasible and paid the stipulated penalty of \$500,000 to EPA in August 2018 for not implementing this project. As noted in the third quarter, 2018 status report, Pepco began evaluating alternative options for treating stormwater discharges to Outfall 101, although not required under the terms of the consent decree or permit. As part of this effort, Pepco's technical consultant (Princeton Hydro) has been collecting and analyzing data on the solids and metals loading concentrations of individual inlets located within the Outfall 101 drainage area. The purpose of individual inlet sampling is to determine which inlet, or portion of the drainage area, contributes higher suspended solids and metals loading in stormwater discharges to Outfall 101. It is expected that this information may help Pepco to target and ultimately better address pollutant loading within the Outfall 101 drainage area.

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

Pepco collected another round of individual samples from the four inlets identified above during a qualifying storm event on April 19, 2019. The results of this sampling are being evaluated by Princeton Hydro to further identify the source of metal and suspended solids loading within the Outfall 101 drainage area. Additionally, samples were collected by Princeton Hydro during a site visit on April 22, 2019 to characterize the grain size of the suspended sediment itself. Results indicate that, compared to typical stormwater suspended sediment, the sediment is relatively fine grained. This suggests possible sediment sources and treatment options for evaluation. It is expected that these sampling data will further support Pepco's effort to identify feasible options for reducing metals and suspended solids in stormwater runoff discharged via Outfall 101.

No further work has been completed during the 4th quarter in the Outfall 101 pollutant loading reductions as PEPCO has been actively working to resolve the discrepancies found in the previous assumptions involving the stormwater inlet piping and discharge locations.

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

Description of Non-Compliance

Pepco collected samples from Outfall 013 during qualifying storm events on November 18 and December 29, 2019.

The initial Outfall 013 analytical results from the sample collected on November 18, 2019 showed an exceedances of the Monthly Average permit limits for zinc. Since the results of the analysis were very close to the permit limit the sample was re-analyzed for Zinc by Microbac. The resulting analysis was lower than the original result but still slightly above (8.8%) the Monthly Average permit limit (Table 1).

Table 1 - Outfall 013 Sampling Results

Analyte	Units	Permit Daily Maximum Limit	Permit Monthly Average Limit	November 18, 2019 Sample (Grab)	November 18, 2019 Sample Re-Analysis (Grab)	Monthly Average
Copper	mg/L	0.0134	0.00524	0.0011		0.0011
Lead	mg/L	0.06458	0.0566	<0.0010		<0.0010
Zinc	mg/L	0.117	0.073	0.0816	0.0771	0.0794*
Iron	mg/L	1	0.69	0.60		0.60
TSS	mg/L	100	30	7.2		7.2

^{*}PEPCO averaged the values of the original and re-analysis to determine the reported DMR sample value for Zinc of 0.0794 mg/L

In addition to the manual grab sample collected on November 18, 2019, Pepco used the previously installed automatic grab sampler within Manhole 33 (which is the compliance sampling point for Outfall 013) to collect a grab sample during this rain event. The results of this sample for zinc was 0.0611 mg/L, which is below both the Daily Maximum and Monthly Average permit limits.

PEPCO submitted the operating procedure for the automatic grab sampler for approval from the EPA on December 20, 2019 to allow for the use of the automatic grab sampler in

obtaining compliance grab samples. If the automatic grab sampler sample had been used in the calculation of the Monthly Average the average of the two November 18th samples would have been 0.0703 mg/L (0.0794 mg/L, from the manual grab sample and 0.0611 mg/L for the automatic sampler) which is below the Monthly Average Limit of 0.073 mg/L. A summary of this data is shown in Table 2. PEPCO continues to believe that the automatic grab sampler setup is a more reliable methodology for sampling since it allows the sample to be collected from a fixed point in the discharge stream thus avoids the potential variability of sampling location that can occur with the manual sampling method.

Also during this past quarter PEPCO collected an additional grab sample on December 29, 2019 to determine if the slightly higher than permit level zinc results experienced in the November 18, 2019 sampling event have been resolved. The results of this analysis, 0.0683 mg/L, was in compliance with both the Daily Maximum and Monthly Average permit limits.

Table 2 - Outfall 013 Results with Automatic Grab Sample Results and December 2019
Sampling Event

Analyte	Units	Permit Daily Maximum Limit	Permit Monthly Average Limit	November 18, 2019 DMR Value (Grab)	November 18, 2019 Sample (ISCO)	November 2019 Monthly Average based on grab and ISCO	December 29, 2019 Sample (Grab)
Zinc	mg/L	0.117	0.073	0.0794	0.0611	0.0703	0.0683

Even though PEPCO reported one exceedance this quarter in the quarterly DMR for zinc, the values received via the ISCO sampler analysis along with the resampling event in December 2019 show that the zinc values have been below the permit limits during this quarter.

As described above (in Paragraph 68.a.5 - Status of Stormwater Treatment System), and as evidenced by the recently updated SWPPP, the ongoing Phase III TMDL Implementation plan, additional stormwater line cleanings and implementation of the Consent Decree requirements, Pepco continues to expend considerable time and resources along with working with AECOM and iStormwater to ensure that the treatment system, storm drain inlet maintenance procedures, metals management, and good housekeeping practices are effective to reduce sources of metals and solids to stormwater discharged from the site and achieve consistent compliance with permit limits.