

Pepco Holdings  
701 Ninth Street NW  
Washington, DC 20068-0001  
202.872.2000

pepcoholdings.com

VIA Electronic mail

October 31, 2024

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 Report for July - September 2024**

Dear Ms. Hopkins,

In accordance with Paragraph 68 of the Benning Facility Consent Decree, please find attached the following reports for the period of July - September 2024:

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

The certification statement is also attached. Please contact me at 703.713.5954 or [michael.ratcliffe@aecom.com](mailto:michael.ratcliffe@aecom.com) if have any questions or need additional information.

Sincerely,



Michael Ratcliffe  
Environmental Program Manager

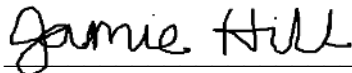
Attachments

Cc: Kathleen Root, EPA Region III  
Jamie Hill, PEPCO

## 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.

Jamie Hill  
Manager, Environmental Management



\_\_\_\_\_  
Signature

10/31/2024

\_\_\_\_\_  
Date

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

Discharge Monitoring Reports

Copies of DMRs for the 3rd Quarter 2024 are attached.



## DMR Copy of Record

Form Approved OMB No. 2040-0004 expires on 07/31/2026

EPA may make all the information submitted through this form (including all attachments) available to the public without further notice to you. Do not use this online form to submit personal information (e.g., non-business cell phone number or non-business email address), confidential business information (CBI), or if you intend to assert a CBI claim on any of the submitted information. Pursuant to 40 CFR 2.203(a), EPA is providing you with notice that all CBI claims must be asserted at the time of submission. EPA cannot accommodate a late CBI claim to cover previously submitted information because efforts to protect the information are not administratively practicable since it may already be disclosed to the public. Although we do not foresee a need for persons to assert a claim of CBI based on the types of information requested in this form, if persons wish to assert a CBI claim we direct submitters to contact the [NPDES eReporting Help Desk](#) for further guidance. Please note that EPA may contact you after you submit this report for more information.

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[illegible]

39496	PCB-1242	1 - Effluent Gross	0	--	Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI											C - No Discharge				
39504	PCB-1254	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L			
					Value NODI											C - No Discharge				
39508	PCB-1260	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L			
					Value NODI											C - No Discharge				

Submission Note

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

Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User: SAILFASTMD

Name: Edward Tracey

E-Mail: edward.traceyjr@exeloncorp.com

Date/Time: 2024-10-15 08:38 (Time Zone: -04:00)

Report Last Signed By

User: HARWYLIE

Name: Lisa Thomas

E-Mail: lisa.thomas@exeloncorp.com

Date/Time: 2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

005  
External Outfall

Discharge:

005-P1  
PAH-1 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

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Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	50.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:22 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

005  
External Outfall

Discharge:

005-P2  
PAH-2 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	400.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:22 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

005  
External Outfall

Discharge:

005-P3  
PAH-3 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample															
					Permit Req.										<=	0.031 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI											C - No Discharge				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

MICHAEL.RATCLIFFE

Name:

Michael Ratcliffe

E-Mail:

michael.ratcliffe@aecom.com

Date/Time:

2024-10-07 12:53 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

005  
External Outfall

Discharge:

005-T  
TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
01002	Arsenic, total [as As]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	340.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39300	4,4'-DDT	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39310	4,4'-DDD	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39320	4,4'-DDE	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39380	Dieldrin	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.24 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39420	Heptachlor epoxide	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.52 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
51032	Chlordane	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.4 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

<b>Attachments</b>	
No attachments.	
<b>Report Last Saved By</b>	
<b>PEPCO Environment Management Services</b>	
User:	SAILFASTMD
Name:	Edward Tracey
E-Mail:	edward.traceyjr@exeloncorp.com
Date/Time:	2024-10-14 08:23 (Time Zone: -04:00)
<b>Report Last Signed By</b>	
User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)



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Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

006  
External Outfall

Discharge:

006-A  
Part I Section E.5 monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										=	11.0	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00600	Nitrogen, total [as N]	1 - Effluent Gross	0	--	Sample										<	1.31	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample										=	0.0	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01027	Cadmium, total [as Cd]	1 - Effluent Gross	0	--	Sample										<	0.5	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01042	Copper, total [as Cu]	1 - Effluent Gross	0	--	Sample										=	16.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01045	Iron, total [as Fe]	1 - Effluent Gross	0	--	Sample										=	690.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01051	Lead, total [as Pb]	1 - Effluent Gross	0	--	Sample										=	9.6	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01067	Nickel, total [as Ni]	1 - Effluent Gross	0	--	Sample										=	3.4	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01092	Zinc, total [as Zn]	1 - Effluent Gross	0	--	Sample										=	89.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
					Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB



39496	PCB-1242	1 - Effluent Gross	0	--	Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
39504	PCB-1254	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
39508	PCB-1260	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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

Edit Check Errors

No errors.

Comments

Attachments

Name	Type	Size
2024_Q3_006_Results_410-181077-1.pdf	pdf	1073473.0

Report Last Saved By

PEPCO Environment Management Services

User:MICHAEL.RATCLIFFE

Name:Michael Ratcliffe

E-Mail:michael.ratcliffe@aecom.com

Date/Time:2024-10-07 12:54 (Time Zone: -04:00)

Report Last Signed By

User:HARWYLIE

Name:Lisa Thomas

E-Mail:lisa.thomas@exeloncorp.com

Date/Time:2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

006  
External Outfall

Discharge:

006-P1  
PAH-1 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	50.0 DAILY MX	28 - ug/L			
					Value NODI											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

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

MICHAEL.RATCLIFFE

Name:

Michael Ratcliffe

E-Mail:

michael.ratcliffe@aecom.com

Date/Time:

2024-10-07 12:55 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

006  
External Outfall

Discharge:

006-P2  
PAH-2 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	400.0 DAILY MX	28 - ug/L			
					Value NODI											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

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

MICHAEL.RATCLIFFE

Name:

Michael Ratcliffe

E-Mail:

michael.ratcliffe@aecom.com

Date/Time:

2024-10-07 12:55 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

006  
External Outfall

Discharge:

006-P3  
PAH-3 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
X 22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample										<	0.051	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.031 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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

Edit Check Errors

Parameter		Monitoring Location	Field	Type	Description	Acknowledge
Code	Name					
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. Please verify that the value you have provided is correct.	Yes

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:24 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

006  
External Outfall

Discharge:

006-T  
TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
01002	Arsenic, total [as As]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	340.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39300	4,4'-DDT	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39310	4,4'-DDD	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39320	4,4'-DDE	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39380	Dieldrin	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.24 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39420	Heptachlor epoxide	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.52 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
51032	Chlordane	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.4 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

<b>Attachments</b>	
<i>No attachments.</i>	
<b>Report Last Saved By</b>	
<b>PEPCO Environment Management Services</b>	
User:	MICHAEL.RATCLIFFE
Name:	Michael Ratcliffe
E-Mail:	michael.ratcliffe@aecom.com
Date/Time:	2024-10-07 12:56 (Time Zone: -04:00)
<b>Report Last Signed By</b>	
User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:  
Major:

DC0000094  
Yes

Permittee:  
Permittee Address:

PEPCO Environment Management Services  
701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:  
Facility Location:

PEPCO - BENNING  
3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

013  
External Outfall

Discharge:

013-I  
0-24 months/Mixing zone study submitted

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:  
Last Name:

Jaclyn  
Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00400	pH	1 - Effluent Gross	0	--	Sample								=	7.12	=	6.99	12 - SU		01/90 - Quarterly	GR - GRAB
					Permit Req.								<=	8.5 MAXIMUM	>=	6.0 MINIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
					Value NODI															
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										=	12.0	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	100.0 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00556	Oil & Grease	1 - Effluent Gross	0	--	Sample										<	4.8	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	10.0 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00600	Nitrogen, total [as N]	1 - Effluent Gross	0	--	Sample										=	0.28	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample										=	0.0	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01027	Cadmium, total [as Cd]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.85 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01042	Copper, total [as Cu]	1 - Effluent Gross	0	--	Sample										=	6.1	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	17.1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01045	Iron, total [as Fe]	1 - Effluent Gross	0	--	Sample										=	350.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1591.0 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01051	Lead, total [as Pb]	1 - Effluent Gross	0	--	Sample										=	9.2	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	102.8 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
					Sample										=	8.2	28 - ug/L		01/90 - Quarterly	GR - GRAB

01067	Nickel, total [as Ni]	1 - Effluent Gross	0	--	Permit Req.											<=	745.2 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI																
01092	Zinc, total [as Zn]	1 - Effluent Gross	0	--	Sample											=	17.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											<=	177.2 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI																
39496	PCB-1242	1 - Effluent Gross	0	--	Sample																
					Permit Req.											<=	1.0 DAILY MX	28 - ug/L		01/YR - Annual	GR - GRAB
					Value NODI												9 - Conditional Monitoring - Not Required This Period				
39504	PCB-1254	1 - Effluent Gross	0	--	Sample																
					Permit Req.											<=	1.0 DAILY MX	28 - ug/L		01/YR - Annual	GR - GRAB
					Value NODI												9 - Conditional Monitoring - Not Required This Period				
39508	PCB-1260	1 - Effluent Gross	0	--	Sample																
					Permit Req.											<=	1.0 DAILY MX	28 - ug/L		01/YR - Annual	GR - GRAB
					Value NODI												9 - Conditional Monitoring - Not Required This Period				
74076	Flow	1 - Effluent Gross	0	--	Sample											=	0.62	03 - MGD		01/90 - Quarterly	GR - GRAB
					Permit Req.												Req Mon TOTAL	03 - MGD		01/90 - Quarterly	GR - GRAB
					Value NODI																

Submission Note

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

Edit Check Errors

No errors.

Comments

Attachments

Name	Type	Size
2024_Q3_013_Results_410-181081-1.pdf	pdf	1064193.0
2024_Q3_013_Results_410-188982-1_Metals.pdf	pdf	9783337.0

Report Last Saved By

PEPCO Environment Management Services

User: SAILFASTMD  
Name: Edward Tracey  
E-Mail: edward.traceyjr@exeloncorp.com  
Date/Time: 2024-10-14 08:50 (Time Zone: -04:00)

Report Last Signed By

User: HARWYLIE  
Name: Lisa Thomas  
E-Mail: lisa.thomas@exeloncorp.com  
Date/Time: 2024-10-22 09:39 (Time Zone: -04:00)



EPA may make all the information submitted through this form (including all attachments) available to the public without further notice to you. Do not use this online form to submit personal information (e.g., non-business cell phone number or non-business email address), confidential business information (CBI), or if you intend to assert a CBI claim on any of the submitted information. Pursuant to 40 CFR 2.203(a), EPA is providing you with notice that all CBI claims must be asserted at the time of submission. EPA cannot accommodate a late CBI claim to cover previously submitted information because efforts to protect the information are not administratively practicable since it may already be disclosed to the public. Although we do not foresee a need for persons to assert a claim of CBI based on the types of information requested in this form, if persons wish to assert a CBI claim we direct submitters to contact the [NPDES eReporting Help Desk](#) for further guidance. Please note that EPA may contact you after you submit this report for more information.

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

013  
External Outfall

Discharge:

013-P1  
PAH-1 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	50.0 DAILY MX	28 - ug/L			
					Value NODI											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

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:36 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

013  
External Outfall

Discharge:

013-P2  
PAH-2 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	400.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

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Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:36 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

013  
External Outfall

Discharge:

013-P3  
PAH-3 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
X 22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample										<	0.16	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.031 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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Edit Check Errors

Parameter		Monitoring Location	Field	Type	Description	Acknowledge
Code	Name					
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. Please verify that the value you have provided is correct.	Yes

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:39 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

013  
External Outfall

Discharge:

013-T  
TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
01002	Arsenic, total [as As]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	340.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39300	4,4'-DDT	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39310	4,4'-DDD	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39320	4,4'-DDE	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39380	Dieldrin	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.24 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39420	Heptachlor epoxide	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.52 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
51032	Chlordane	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.4 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

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Edit Check Errors

No errors.

Comments

<b>Attachments</b>	
No attachments.	
<b>Report Last Saved By</b>	
<b>PEPCO Environment Management Services</b>	
User:	SAILFASTMD
Name:	Edward Tracey
E-Mail:	edward.traceyjr@exeloncorp.com
Date/Time:	2024-10-14 08:40 (Time Zone: -04:00)
<b>Report Last Signed By</b>	
User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

014  
External Outfall

Discharge:

014-A  
Part I Section E.1 monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										=	8.9	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00600	Nitrogen, total [as N]	1 - Effluent Gross	0	--	Sample										=	0.52	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample										<	0.1	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01027	Cadmium, total [as Cd]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01042	Copper, total [as Cu]	1 - Effluent Gross	0	--	Sample										=	4.8	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01045	Iron, total [as Fe]	1 - Effluent Gross	0	--	Sample										=	230.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01051	Lead, total [as Pb]	1 - Effluent Gross	0	--	Sample										=	1.8	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01067	Nickel, total [as Ni]	1 - Effluent Gross	0	--	Sample										<	1.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01092	Zinc, total [as Zn]	1 - Effluent Gross	0	--	Sample										=	50.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
					Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB

39496	PCB-1242	1 - Effluent Gross	0	--	Permit Req.												Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB		
					Value NODI																		
39504	PCB-1254	1 - Effluent Gross	0	--	Sample												=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB	
					Permit Req.														Req Mon DAILY MX		28 - ug/L	01/90 - Quarterly	GR - GRAB
					Value NODI																		
39508	PCB-1260	1 - Effluent Gross	0	--	Sample												=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB	
					Permit Req.														Req Mon DAILY MX		28 - ug/L	01/90 - Quarterly	GR - GRAB
					Value NODI																		

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

Name	Type	Size
2024_Q3_014_Results_410-188977-1.pdf	pdf	1148384.0

Report Last Saved By

PEPCO Environment Management Services

User: SAILFASTMD

Name: Edward Tracey

E-Mail: edward.traceyjr@exeloncorp.com

Date/Time: 2024-10-14 08:42 (Time Zone: -04:00)

Report Last Signed By

User: HARWYLIE

Name: Lisa Thomas

E-Mail: lisa.thomas@exeloncorp.com

Date/Time: 2024-10-22 09:39 (Time Zone: -04:00)



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Permitted Feature:

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Discharge:

014-P1  
PAH-1 TMDL monitoring

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Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	50.0 DAILY MX	28 - ug/L			
					Value NODI											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

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:42 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)



EPA may make all the information submitted through this form (including all attachments) available to the public without further notice to you. Do not use this online form to submit personal information (e.g., non-business cell phone number or non-business email address), confidential business information (CBI), or if you intend to assert a CBI claim on any of the submitted information. Pursuant to 40 CFR 2.203(a), EPA is providing you with notice that all CBI claims must be asserted at the time of submission. EPA cannot accommodate a late CBI claim to cover previously submitted information because efforts to protect the information are not administratively practicable since it may already be disclosed to the public. Although we do not foresee a need for persons to assert a claim of CBI based on the types of information requested in this form, if persons wish to assert a CBI claim we direct submitters to contact the [NPDES eReporting Help Desk](#) for further guidance. Please note that EPA may contact you after you submit this report for more information.

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

014  
External Outfall

Discharge:

014-P2  
PAH-2 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	400.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

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E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:42 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Major:

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Permittee:

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701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

014  
External Outfall

Discharge:

014-P3  
PAH-3 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.031 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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Edit Check Errors

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Comments

Attachments

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PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:43 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

014  
External Outfall

Discharge:

014-T  
TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
01002	Arsenic, total [as As]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	340.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39300	4,4'-DDT	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39310	4,4'-DDD	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39320	4,4'-DDE	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39380	Dieldrin	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.24 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39420	Heptachlor epoxide	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.52 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
51032	Chlordane	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.4 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

<b>Attachments</b>	
<i>No attachments.</i>	
<b>Report Last Saved By</b>	
<b>PEPCO Environment Management Services</b>	
User:	SAILFASTMD
Name:	Edward Tracey
E-Mail:	edward.traceyjr@exeloncorp.com
Date/Time:	2024-10-14 08:43 (Time Zone: -04:00)
<b>Report Last Signed By</b>	
User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

015  
External Outfall

Discharge:

015-A  
Part I Section E.2 monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										=	4.6	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00600	Nitrogen, total [as N]	1 - Effluent Gross	0	--	Sample										<	2.3	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample										<	0.1	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01027	Cadmium, total [as Cd]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01042	Copper, total [as Cu]	1 - Effluent Gross	0	--	Sample										=	5.2	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01045	Iron, total [as Fe]	1 - Effluent Gross	0	--	Sample										=	170.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01051	Lead, total [as Pb]	1 - Effluent Gross	0	--	Sample										=	1.2	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01067	Nickel, total [as Ni]	1 - Effluent Gross	0	--	Sample										=	1.6	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01092	Zinc, total [as Zn]	1 - Effluent Gross	0	--	Sample										=	24.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
					Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB

39496	PCB-1242	1 - Effluent Gross	0	--	Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
39504	PCB-1254	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
39508	PCB-1260	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

Name	Type	Size
2024_Q3_015_Results_410-183664-1.pdf	pdf	1075331.0

Report Last Saved By

PEPCO Environment Management Services

User: SAILFASTMD

Name: Edward Tracey

E-Mail: edward.traceyjr@exeloncorp.com

Date/Time: 2024-10-14 08:54 (Time Zone: -04:00)

Report Last Signed By

User: HARWYLIE

Name: Lisa Thomas

E-Mail: lisa.thomas@exeloncorp.com

Date/Time: 2024-10-22 09:39 (Time Zone: -04:00)

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Facility:

PEPCO - BENNING

Facility Location:

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WASHINGTON, DC 20019

Permitted Feature:

015  
External Outfall

Discharge:

015-P1  
PAH-1 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

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Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units		
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample													01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	50.0 DAILY MX	28 - ug/L		
					Value NODI											9 - Conditional Monitoring - Not Required This Period			

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User:

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E-Mail:

lisa.thomas@exeloncorp.com

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PEPCO - BENNING

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WASHINGTON, DC 20019

Permitted Feature:

015  
External Outfall

Discharge:

015-P2  
PAH-2 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	400.0 DAILY MX	28 - ug/L			
					Value NODI											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

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:55 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)



EPA may make all the information submitted through this form (including all attachments) available to the public without further notice to you. Do not use this online form to submit personal information (e.g., non-business cell phone number or non-business email address), confidential business information (CBI), or if you intend to assert a CBI claim on any of the submitted information. Pursuant to 40 CFR 2.203(a), EPA is providing you with notice that all CBI claims must be asserted at the time of submission. EPA cannot accommodate a late CBI claim to cover previously submitted information because efforts to protect the information are not administratively practicable since it may already be disclosed to the public. Although we do not foresee a need for persons to assert a claim of CBI based on the types of information requested in this form, if persons wish to assert a CBI claim we direct submitters to contact the [NPDES eReporting Help Desk](#) for further guidance. Please note that EPA may contact you after you submit this report for more information.

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

015  
External Outfall

Discharge:

015-P3  
PAH-3 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.031 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 08:56 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

015  
External Outfall

Discharge:

015-T  
TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
01002	Arsenic, total [as As]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	340.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39300	4,4'-DDT	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39310	4,4'-DDD	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39320	4,4'-DDE	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39380	Dieldrin	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.24 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39420	Heptachlor epoxide	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.52 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
51032	Chlordane	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.4 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

<b>Attachments</b>	
No attachments.	
<b>Report Last Saved By</b>	
<b>PEPCO Environment Management Services</b>	
User:	SAILFASTMD
Name:	Edward Tracey
E-Mail:	edward.traceyjr@exeloncorp.com
Date/Time:	2024-10-14 08:56 (Time Zone: -04:00)
<b>Report Last Signed By</b>	
User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:  
Major:

DC0000094  
Yes

Permittee:  
Permittee Address:

PEPCO Environment Management Services  
701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:  
Facility Location:

PEPCO - BENNING  
3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

016  
External Outfall

Discharge:

016-A  
Part I Section E.3 monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:  
Last Name:

Jaclyn  
Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										=	6.4	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00600	Nitrogen, total [as N]	1 - Effluent Gross	0	--	Sample										<	2.4	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample										<	0.1	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01027	Cadmium, total [as Cd]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01042	Copper, total [as Cu]	1 - Effluent Gross	0	--	Sample										=	13.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01045	Iron, total [as Fe]	1 - Effluent Gross	0	--	Sample										=	510.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01051	Lead, total [as Pb]	1 - Effluent Gross	0	--	Sample										=	1.6	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01067	Nickel, total [as Ni]	1 - Effluent Gross	0	--	Sample										=	16.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01092	Zinc, total [as Zn]	1 - Effluent Gross	0	--	Sample										=	26.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
					Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB

39496	PCB-1242	1 - Effluent Gross	0	--	Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
39504	PCB-1254	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
39508	PCB-1260	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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

Edit Check Errors

No errors.

Comments

Attachments

Name	Type	Size
2024_Q3_016_Results_410-183657-1.pdf	pdf	1078981.0

Report Last Saved By

PEPCO Environment Management Services

User: SAILFASTMD

Name: Edward Tracey

E-Mail: edward.traceyjr@exeloncorp.com

Date/Time: 2024-10-14 08:57 (Time Zone: -04:00)

Report Last Signed By

User: HARWYLIE

Name: Lisa Thomas

E-Mail: lisa.thomas@exeloncorp.com

Date/Time: 2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

016  
External Outfall

Discharge:

016-P1  
PAH-1 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	50.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 09:19 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

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DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

016  
External Outfall

Discharge:

016-P2  
PAH-2 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units		
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample													01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	400.0 DAILY MX	28 - ug/L		
					Value NODI											9 - Conditional Monitoring - Not Required This Period			

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 09:20 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)



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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

016  
External Outfall

Discharge:

016-P3  
PAH-3 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.031 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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

Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 09:20 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)



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Permit

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DC0000094

Major:

Yes

Permittee:

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Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

016  
External Outfall

Discharge:

016-T  
TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
01002	Arsenic, total [as As]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	340.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39300	4,4'-DDT	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39310	4,4'-DDD	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39320	4,4'-DDE	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39380	Dieldrin	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.24 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39420	Heptachlor epoxide	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.52 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
51032	Chlordane	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.4 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

<b>Attachments</b>	
No attachments.	
<b>Report Last Saved By</b>	
<b>PEPCO Environment Management Services</b>	
User:	SAILFASTMD
Name:	Edward Tracey
E-Mail:	edward.traceyjr@exeloncorp.com
Date/Time:	2024-10-14 09:21 (Time Zone: -04:00)
<b>Report Last Signed By</b>	
User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:  
Major:

DC0000094  
Yes

Permittee:  
Permittee Address:

PEPCO Environment Management Services  
701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:  
Facility Location:

PEPCO - BENNING  
3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

101  
External Outfall

Discharge:

101-F  
12-24 months from PED/Mixing Zone study submitted

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:  
Last Name:

Jaclyn  
Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00400	pH	1 - Effluent Gross	0	--	Sample								=	6.92	=	6.92	12 - SU		01/90 - Quarterly	GR - GRAB
					Permit Req.								<=	8.5 MAXIMUM	>=	6.0 MINIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
					Value NODI															
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										=	5.1	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	100.0 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00556	Oil & Grease	1 - Effluent Gross	0	--	Sample										=	0.0	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	10.0 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00600	Nitrogen, total [as N]	1 - Effluent Gross	0	--	Sample										=	0.33	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample										<	0.1	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01027	Cadmium, total [as Cd]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	17.3 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01042	Copper, total [as Cu]	1 - Effluent Gross	0	--	Sample										=	6.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	67.4 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01045	Iron, total [as Fe]	1 - Effluent Gross	0	--	Sample										=	120.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	9643.0 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01051	Lead, total [as Pb]	1 - Effluent Gross	0	--	Sample										=	1.6	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	622.7 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
					Sample										=	1.4	28 - ug/L		01/90 - Quarterly	GR - GRAB

01067	Nickel, total [as Ni]	1 - Effluent Gross	0	--	Permit Req.											<=	4515.0 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI																
01092	Zinc, total [as Zn]	1 - Effluent Gross	0	--	Sample											=	11.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											<=	994.2 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI																
39496	PCB-1242	1 - Effluent Gross	0	--	Sample																
					Permit Req.											<=	1.0 DAILY MX	28 - ug/L		01/YR - Annual	GR - GRAB
					Value NODI												9 - Conditional Monitoring - Not Required This Period				
39504	PCB-1254	1 - Effluent Gross	0	--	Sample																
					Permit Req.											<=	1.0 DAILY MX	28 - ug/L		01/YR - Annual	GR - GRAB
					Value NODI												9 - Conditional Monitoring - Not Required This Period				
39508	PCB-1260	1 - Effluent Gross	0	--	Sample																
					Permit Req.											<=	1.0 DAILY MX	28 - ug/L		01/YR - Annual	GR - GRAB
					Value NODI												9 - Conditional Monitoring - Not Required This Period				
74076	Flow	1 - Effluent Gross	0	--	Sample											=	0.03	03 - MGD		01/90 - Quarterly	GR - GRAB
					Permit Req.												Req Mon TOTAL	03 - MGD		01/90 - Quarterly	GR - GRAB
					Value NODI																

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

Name	Type	Size
2024_Q3_101_Results_410-183665-1.pdf	pdf	1065799.0

Report Last Saved By

PEPCO Environment Management Services

User:	MICHAEL.RATCLIFFE
Name:	Michael Ratcliffe
E-Mail:	michael.ratcliffe@aecom.com
Date/Time:	2024-10-14 12:02 (Time Zone: -04:00)

Report Last Signed By

User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

101  
External Outfall

Discharge:

101-P1  
PAH-1 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	50.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 09:24 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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DC0000094

Major:

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Permittee:

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Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

101  
External Outfall

Discharge:

101-P2  
PAH-2 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	400.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

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Comments

Attachments

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PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 09:24 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permittee:

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701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

101  
External Outfall

Discharge:

101-P3  
PAH-3 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.031 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

Submission Note

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

Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 09:24 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)



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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

101  
External Outfall

Discharge:

101-T  
TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
01002	Arsenic, total [as As]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	340.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39300	4,4'-DDT	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39310	4,4'-DDD	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39320	4,4'-DDE	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39380	Dieldrin	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.24 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39420	Heptachlor epoxide	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.52 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
51032	Chlordane	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.4 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments



<b>Attachments</b>	
No attachments.	
<b>Report Last Saved By</b>	
<b>PEPCO Environment Management Services</b>	
User:	SAILFASTMD
Name:	Edward Tracey
E-Mail:	edward.traceyjr@exeloncorp.com
Date/Time:	2024-10-14 09:25 (Time Zone: -04:00)
<b>Report Last Signed By</b>	
User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

401  
External Outfall

Discharge:

401-A  
Part I Section E.6 monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										<	3.0	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00600	Nitrogen, total [as N]	1 - Effluent Gross	0	--	Sample										<	1.83	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample										<	0.1	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01027	Cadmium, total [as Cd]	1 - Effluent Gross	0	--	Sample										=	0.51	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01042	Copper, total [as Cu]	1 - Effluent Gross	0	--	Sample										=	16.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01045	Iron, total [as Fe]	1 - Effluent Gross	0	--	Sample										=	56.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01051	Lead, total [as Pb]	1 - Effluent Gross	0	--	Sample										=	1.9	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01067	Nickel, total [as Ni]	1 - Effluent Gross	0	--	Sample										=	1.1	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
01092	Zinc, total [as Zn]	1 - Effluent Gross	0	--	Sample										=	150.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.											Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															
					Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB

39496	PCB-1242	1 - Effluent Gross	0	--	Permit Req.												Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB		
					Value NODI																		
39504	PCB-1254	1 - Effluent Gross	0	--	Sample												=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB	
					Permit Req.														Req Mon DAILY MX		28 - ug/L	01/90 - Quarterly	GR - GRAB
					Value NODI																		
39508	PCB-1260	1 - Effluent Gross	0	--	Sample												=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB	
					Permit Req.														Req Mon DAILY MX		28 - ug/L	01/90 - Quarterly	GR - GRAB
					Value NODI																		

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

Name	Type	Size
2024_Q3_401_Results_410-181079-1.pdf	pdf	1070488.0

Report Last Saved By

PEPCO Environment Management Services

User: SAILFASTMD

Name: Edward Tracey

E-Mail: edward.traceyjr@exeloncorp.com

Date/Time: 2024-10-14 09:26 (Time Zone: -04:00)

Report Last Signed By

User: HARWYLIE

Name: Lisa Thomas

E-Mail: lisa.thomas@exeloncorp.com

Date/Time: 2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

401  
External Outfall

Discharge:

401-P1  
PAH-1 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	50.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 09:27 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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Permit

Permit #:

DC0000094

Major:

Yes

Permittee:

PEPCO Environment Management Services

Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

401  
External Outfall

Discharge:

401-P2  
PAH-2 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	400.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

PEPCO Environment Management Services

User:

SAILFASTMD

Name:

Edward Tracey

E-Mail:

edward.traceyjr@exeloncorp.com

Date/Time:

2024-10-14 09:27 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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DC0000094

Major:

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Permittee Address:

701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

401  
External Outfall

Discharge:

401-P3  
PAH-3 TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type	
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
22456	Polynuclear Aromatic Hydrocarbons [PAHs]	1 - Effluent Gross	0	--	Sample										=	0.0	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.031 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
					Value NODI															

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Comments

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PEPCO Environment Management Services

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Date/Time:

2024-10-14 09:27 (Time Zone: -04:00)

Report Last Signed By

User:

HARWYLIE

Name:

Lisa Thomas

E-Mail:

lisa.thomas@exeloncorp.com

Date/Time:

2024-10-22 09:39 (Time Zone: -04:00)

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701 Ninth Street, NW, Room 6219  
ATTN: Denise Campbell  
WASHINGTON, DC 20019

Facility:

PEPCO - BENNING

Facility Location:

3300 BENNING ROAD, N.E.  
WASHINGTON, DC 20019

Permitted Feature:

401  
External Outfall

Discharge:

401-T  
TMDL monitoring

Report Dates & Status

Monitoring Period:

From 07/01/24 to 09/30/24

DMR Due Date:

10/28/24

Status:

NetDMR Validated

Considerations for Form Completion

Principal Executive Officer

First Name:

Jaclyn

Last Name:

Cantler

Title:

VP Electric Operations

Telephone:

302-283-6119

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
01002	Arsenic, total [as As]	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	340.0 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39300	4,4'-DDT	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39310	4,4'-DDD	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39320	4,4'-DDE	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	1.1 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39380	Dieldrin	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.24 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
39420	Heptachlor epoxide	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	0.52 DAILY MX	28 - ug/L			
					Value NODI											9 - Conditional Monitoring - Not Required This Period				
51032	Chlordane	1 - Effluent Gross	0	--	Sample														01/90 - Quarterly	GR - GRAB
					Permit Req.										<=	2.4 DAILY MX	28 - ug/L			
					Value NODI											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

<b>Attachments</b>	
No attachments.	
<b>Report Last Saved By</b>	
<b>PEPCO Environment Management Services</b>	
User:	SAILFASTMD
Name:	Edward Tracey
E-Mail:	edward.traceyjr@exeloncorp.com
Date/Time:	2024-10-14 09:27 (Time Zone: -04:00)
<b>Report Last Signed By</b>	
User:	HARWYLIE
Name:	Lisa Thomas
E-Mail:	lisa.thomas@exeloncorp.com
Date/Time:	2024-10-22 09:39 (Time Zone: -04:00)



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

#### Annual Inspection of the Drainage System

The 2024 annual stormwater drainage system CCTV inspection was completed in the 2nd quarter, 2024. The results of the CCTV inspection were analyzed by Pepco's consulting engineer in the 3<sup>rd</sup> quarter, 2024, and several items were identified for follow-up:

17 stormwater lines identified as needing cleaning.

Stormwater Lines / Structures in need of repair:

- I-29 to WQS-1
- I-73 to M-56
- M-63 to M-63A
- WQS-4 to M-54

The status of these corrective actions are as follows:

- Cleaning of the seventeen (17) stormwater piping segments identified during the 2024 CCTV inspections will be completed in December 2024.
- Pepco has been working to select a vendor to complete the repairs for the line segments from I-29 to WQS-1, I-73 to M-56, M-63 to M-63A, and WQS-4 to M-54. We expect to award the contract for repairs during the fourth quarter, 2024.
- I-29 to WQS-1 had been identified as needing repairs in the 2023 CCTV report but was no longer flagged as requiring repairs as of the 2024 CCTV inspection. Pepco will continue monitoring this structure.
- Pepco completed repairs to the damaged lid (reported in Q1 2024) on structure I-18 on July 9<sup>th</sup>, 2024. MH-18 had previously been identified as damaged in Q1 2024 as well, but this has since been deemed superficial only.

Based on the results of the CCTV inspection, several other areas were identified by Pepco's consulting engineer to be monitored for future cleaning and/or repair. Pepco will review these areas again as part of the 2025 CCTV inspection.

#### Site Drainage Drawing

There have been no changes to the site drainage map in Q3 2024.

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

Storm Drain Inlets Inspection Logs

The weekly storm drains inspection logs for –July – September 2024 are attached. Additionally, the storm drain inspection log for the week of 5/13/2024 was absent from the Q2 consent decree report and has been included in this submittal.

PEPCO STORM DRAIN SHEET for DATE: 05-13-2024

Signature: Julius Tompkins

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	yes						Sediment swept clean
2	yes						Check for trash / debris inside YES clean
3	yes						Check for trash / debris inside NO clean
4	✓						Check for trash / debris inside NO clean
5	✓						Check for trash / debris inside NO
5a	✓						Check for trash / debris inside NO
6	✓						Check for trash / debris inside YES
6a	✓						in good condition
7	✓						condition good.
8	✓						feet free from debris
9	✓						clean rocks from surroundings
10	✓						debris swept from surroundings
11	✓						in good condition from leaves
12	✓						leaves swept away
13	✓						cleaned and swept
14	✓						rocks swept away
15	✓						in good condition from grass
17	✓						trash cleaned
18	✓						in good con
19	✓						boom cleaned from debris
20	✓						condition is good
21	✓						

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

05-18-2024

Signature:

Tellus Fombale

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	✓						Clean the grass away condition good
24A	✓						Cloth Cover rearranged cover Boom changed and swept in good condition
25	✓						sweep debris away.
27	✓						condition good
28	✓						condition good
29	✓						debris swept away
30	✓						Cleaned
37	✓						debris swept away
38	✓						debris swept away
39	✓						debris swept away
40	✓						debris swept away
41	✓						debris swept away
42	✓						debris swept away
43	✓						debris swept away
44	✓						debris swept away

\*January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

05-13-2024

Signature:

Julius Fombali

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	✓						Center drainage area clear? (Yes or No) <b>Yes</b> Trash swept away trash/dirt swept away Boom cleaned and unstung sediment swept away Clear
46	✓						in good condition from trash
47	✓						inside Substation 7 couldn't get in trash/debris swept away sticks and grass swept in good condition surroundings cleaned debris swept away Rocks swept away grass and trash swept condition good.
48	✓						
49	✓						
50	✓						
51	✓						
52	✓						
53	✓						
54	✓						
56	✓						
57	✓						
58	✓						
60	✓						
61	✓						
62	✓						

\*January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

05-13-2024

Signature:

Julius Simbala

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	✓						In good condition from grass
64	✓						In good condition
65	✓						In good condition from dirt.
66	✓						Debris swept from surrounding
67	✓						Check for trash / debris inside
68	✓						cleaned
69	✓						Check for trash / debris inside
70	✓						Boom clean and arranged
71	✓						In good condition from trash
72	✓						Boom clean and rearranged
73	✓						Check for trash / debris inside
74	✓						In good condition from dirt
75	✓						Check for trash / debris inside
76	✓						Check for trash / debris inside
77	✓						Check for trash / debris inside
78	✓						Sweeoundings checked, swept
79	✓						In good condition from grass
80	✓						Check for trash / debris inside
81	✓						Sweeoundings swept
82	✓						Sweeoundings swept clean
83	✓						Boom rearranged

\*January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

05-13-2024

Signature:

Tyler Tomball

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	✓						Sediments clean up swept & sediments
95	✓						in good condition from trash
96	✓						rocks swept away
97	✓						grass swept away
98	✓						Check for Trash / Debris
99	✓						Yes
100	✓						in good condition from dirt
101	✓						in good condition from dirt
102	✓						trash was swept away
103	✓						surroundings cleaned &
104	✓						boom cleaned & rearranged
107	✓						condition good from dirt
108	✓						dirt swept away
108A	✓						grass cleaned &
108B	✓						trash swept away
109							sediment swept &
110							rocks swept away

\* January, April, July, October

Tim Dinsmore



PEPCO STORM DRAIN SHEET for DATE: **TUE JUL 2**

Signature: *Michael P. Davis*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	YES	NO	NO	YES			Remove Green
2	YES	NO	NO	YES			Remove dirty from Boom
3	YES						Check for trash / debris inside None at all
4	YES						Check for trash / debris inside All good
5	YES						Check for trash / debris inside Rocks Cover IT
5a	YES						Check for trash / debris inside
6	YES						Check for trash / debris inside Rocks Cover
6a	YES						Check for trash / debris inside NO MORE
7	YES	NO	NO	YES			Rocks Cover IT
8	YES	NO	NO	YES			Rocks cover if
9	YES	NO	NO	YES			Check for trash fit up
10	YES	NO	NO	YES			Rocks cover IT
11	YES	NO	NO	YES			Clean Area
12	YES	NO	NO	YES			Clean Area
13	YES	NO	NO	YES			Clean Area
14	YES	NO	NO	YES			ALL clear
15	YES	NO	NO	YES			ALL clear
17	YES	NO	NO	YES			ALL clear
18	YES	NO	NO	YES			ALL clear
19	YES	NO					ALL clear
20	YES	NO	NO	YES			ALL clear
21	YES	NO	NO	YES			ALL clear

\*January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: Tuesday

Signature: Michael R. Shivers

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	YES	NO	NO	YES			Cover still in tank
24A	YES	NO	NO	YES			ALL CLEAR
25	YES		NO	YES			Cover still there
27	YES	NO	NO	YES			Cloth Cover
28	YES	NO	NO	YES			ALL CLEAR
29	YES	NO	NO	YES			ALL CLEAR
30	YES	NO	NO	YES			ALL CLEAR
37	YES	NO	NO	YES			Inside Substation 41
38	YES					NO	ALL CLEAR
39	YES					NO	ALL CLEAR
40	YES					NO	ALL CLEAR
41	YES	NO					ALL CLEAR
42	YES						ALL CLEAR
43	YES						ALL CLEAR
44	YES						ALL CLEAR

\*January, April, July, October

PEPCO STORM DRAIN SHEET for DATE:

July 4, 2008

Signature:

Michael P. Shivers

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	YES						Center drainage area clear? (Yes or No)
46	YES	NO	NO	YES			ALL Sleep Remove BOB
47	YES	NO	NO	YES			ALL Sleep Remove BOB
48	YES	NO	NO	YES			ALL Sleep Remove BOB
49	YES						ALL Sleep Remove BOB
50	YES						Check for trash / debris inside
51	YES	NO					NO WORK GET THAT DONE
52	YES	NO	NO	YES			Inside Substation 7
53	YES		NO	YES			DO NOT TOUCH ANYTHING
54	YES					NO	CLEAN ALL CURBS
56	YES	NO	NO				CLEAN ALL SECURE
57	YES	NO					ALL SECURE
58	YES	YES	NO	YES			ALL SECURE
60	YES					NO	ALL SECURE
61	YES					NO	ALL SECURE
62	YES					NO	ALL SECURE

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE 5/6/14

Signature: Michael P. Smith

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
63	YES					NO	CLEAN AREA
64	YES					NO	CLEAN AREA
65	YES	NO	NO	YES			Job well done
66	YES						ALL CLEAN
67	YES			YES			Check for trash / debris inside
68	YES					YES	CLEAN AREA
69	YES						Check for trash / debris inside
70	YES	NO	NO	YES			CLEAN AREA
71	YES	NO	NO	YES			CLEAN AREA
72	YES	NO	NO	YES			CLEAN AREA
73	YES						Check for trash / debris inside
74	YES	NO					PICK UP FROM BAG
75	YES						BLOW IT OUT
76	YES						Check for trash / debris inside
77	YES						BLOW IT OUT
78	YES	NO	NO	YES			Check for trash / debris inside
79	YES	NO	NO	YES			BLOW IT OUT
80	YES						ALL CLEAR
81	YES	NO	NO	YES			ALL CLEAR
82	YES	NO	NO	YES			Check for trash / debris inside
83	YES	NO	NO	YES			CLEAN AREA

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: July 14, 2023

Signature: Michael St...

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	YES		NO	NO			AREA Clear
95	YES	NO	YES	NO			STILL THE SAME GROUND LEVEL
96	YES	NO	NO	NO			AREA Clear
97	YES						BORE GOOD
98	YES	NO	NO	NO			AREA Clear
99	YES						Check for Trash / Debris
100	YES		NO	YES			100% good
101	YES	NO					AREA Clear
102	YES						AREA Clear
103	YES						AREA Clear
104	YES					YES	AREA Clear
107	YES	NO					COVER WITH ROCKS
108	YES	NO					Area Clear
108A	YES	NO					Area Clear
108B	YES						Area Clear
109					NO		Area Clear
110					NO		Look Inside all Clear

\*January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 02-11-2021 Signature: Rodolfo Astudillo

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	✓	N/D	N/D	yes			Removed Green Remove dirty from Boom
2	✓						Check for trash / debris inside none at all
3	✓						Check for trash / debris inside all good
4	✓						Check for trash / debris inside Rocks cover it
5	✓						Check for trash / debris inside
5a	✓						Check for trash / debris inside Rocks cover it
6	✓						Check for trash / debris inside No more
6a	✓						Rocks cover it
7	✓	N/D	N/D	yes			Rocks cover it
8	✓	N/D	N/D	yes			Cocks cover it
9	✓	N/D	N/D	yes			check for trash Pit up
10	✓	N/D	N/D	yes			Rocks cover it clean area
11	✓	N/D	N/D	yes			clean area
12	✓	N/D	N/D	yes			clean area
13	✓	N/D	N/D	yes			All clean clear
14	✓	N/D	N/D	yes			All clean area
15	✓	N/D	N/D	yes			All clean area
17	✓	N/D	N/D	yes			All clean area
18	✓	N/D	N/D	yes			All clean area
19	✓	N/D	N/D	yes			All clear
20	✓	N/D	N/D	yes			All clear
21	✓	N/D	N/D	yes			All clear

\*January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 07-11-21

Signature:

Rodolfo Acuña

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	✓	NO	NO	✓			cover still in tact
24A	✓	NO	NO	✓			ALL clear
25	✓		NO	✓			Cloth Cover
27	✓	NO	NO	✓			ALL clear
28	✓	NO	NO	✓			ALL clear
29	✓	NO	NO	✓			ALL clear
30	✓	NO	NO	✓			Inside Substation 41st street dirty track
37	✓	NO	NO	✓			ALL clear
38	✓						ALL clear
39	✓						ALL clear
40	✓						ALL clear
41	✓	NO					ALL clear
42	✓						ALL clear
43	✓						ALL clear
44	✓						ALL clear

\* January, April, July, October

PEPCO STORM DRAIN SHEET for DATE: 07-12-24

Signature:

Rodolfo Acuña

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	✓						Center drainage area clear? (Yes or No)
46	✓	NO	NO	yes			ALL sleep removed
47	✓	NO	NO	yes			ALL sleep removed
48	✓	NO	NO	yes			ALL sleep removed. Room
49	✓						Check for trash / debris inside
50	✓						so we can get the job done
51	✓	NO		yes			inside Substation
52	✓	NO	NO	yes			cleaned all catch basins
53	✓		NO	yes			cleaned all secure
54	✓						all secure
56	✓	NO	NO				all secure
57	✓	NO					all secure
58	✓	NO	NO	yes			all secure
60	✓						all secure
61	✓						all secure
62	✓						all secure

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 07-11-24

Signature:

Rodolfo A. Cruz Jr.

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
63	✓					NO	Area clear
64	✓					NO	Still the same. as last check
65	✓	NO	NO	NO			Area clear
66	✓						Area clear
67	✓		NO	NO			Check for trash / debris inside Look good.
68	✓					NO	Area clear
69	✓						Check for trash / debris inside Look good
70	✓	NO	NO	NO			Area clear
71	✓	NO	NO	NO			Cleaner area
72	✓	NO	NO	NO			Clean area
73	✓						Check for trash / debris inside
74	✓	NO					Check for trash / debris inside
75	✓						Area clear
76	✓						Check for trash / debris inside
77	✓						Check for trash / debris inside
78	✓	NO	NO	NO			Area clear
79	✓	NO	NO	NO			Area clear
80	✓						Check for trash / debris inside
81	✓	NO	NO	NO			Area clear
82	✓	NO	NO	NO			Area clear
83	✓	NO	NO	NO			Area clear

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

07-11-24

Signature:

Rodolfo Acuña

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	✓		NO	NO			Area clean
95	✓	NO	NO	NO			fill the same as previous deck
96	✓	NO	NO	NO			Area clean
97	✓						Look good
98	✓	NO	NO	NO			Area clean
99	✓						Check for Trash / Debris
100	✓		NO				Area clean
101	✓	NO					Area clean
102	✓						Area clean
103	✓						Area clean
104	✓					Yes	Area clean
107	✓	NO					cover with rocks
108	✓	NO					clean area
108A	✓	NO					clean area
108B	✓						clean area
109					NO		clean area
110					NO		Look inside all clear

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/15/24

Signature:

Kornell Hartley

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	NO	NO	YES	YES			Replaced and cleaned around Boom Cleaned Boom from Trash/dirt
2	NO	NO	NO				Check for trash / debris inside Clean
3	NO						Check for trash / debris inside Clean
4	NO						Check for trash / debris inside Clean
5	NO						Check for trash / debris inside Clean
5a	NO						Check for trash / debris inside Clean
6	NO						Check for trash / debris inside Clean
6a	NO						in condition from Trash/debris
7	NO	NO	NO	YES			in good condition from dirt/Sand
8	NO	NO	NO	YES			in good condition from sticks/grass
9	NO	NO	NO	YES			Cleaned Boom from Rocks/Sand
10	YES	NO	NO	YES			Cleaned Boom from Trash/debris
11	YES	NO	NO	YES			in good condition from Rocks/pebbles
12	NO	NO	NO	YES			in good condition from debris/dirt
13	NO	NO	NO	YES			in good condition from Sand/Trash
14	NO	NO	NO	YES			in good condition from grass/sticks/Trash
15	NO	NO	NO	YES			in good condition from Sand/dirt
17	YES	NO	NO	YES			Cleaned Boom from Sand/Trash
18	YES	NO	NO	YES			Cleaned Boom from debris/Trash
19	NO	NO					in good condition from debris/Sand
20	NO	NO	NO	YES			in good condition from Trash/dirt
21	NO	NO	NO	YES			in good condition from Sand/pebbles

\* January, April, July, October

Revision: July, 2023



PEPCO STORM DRAIN SHEET for DATE: 7/15/24

Signature: Ronnell Harley

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
24	no	no	no	yes			in good condition from grass/sticks/dirt in good condition from sand/debris
24A	no	no	no	yes			Cloth Cover Clear
25	no		no	yes			Cleaned Boom from Trash/sticks/grass
27	yes	no	no	yes			Cleaned Boom from debris/grass/sand
28	yes	no	no	yes			Cleaned Boom from pebbles/dirt
29	yes	no	no	yes			Inside Substation 41 Clear
30	no	no	no	yes			Cleaned Boom from debris/Trash
37	yes	no	no	yes		no	Cleaned Curb/guard from debris/sand
38	yes					no	Cleaned curb guard from Trash/sticks
39	yes					no	Cleaned curb guard from Rocks/debris
40	yes						Cleaned Curb guard from sand/dirt
41	no	no					in good condition from debris/dirt
42	no						in good condition from Trash/sand
43	no						in good condition from Trash/pebbles
44	no						

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/15/24

Signature:

Ronell Hardy

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	no						Center drainage area clear? (Yes or No) Clean
46	no	no	no	no			in good condition from debris/Trash
47	no	no	no	no			in good condition from sand/Rocks
48	yes	no	no	yes			cleaned from sand/Rocks/pebbles
49	no						in good condition from Trash/debris
50	no						Check for trash / debris inside Clean
51	no	no					in good condition from sticks/dirt
52	no	no	no	yes			inside Substation 7 Clean
53	no		no	yes		no	Cleaned Boom from grass/sticks/pebbles
54	yes						Cleaned Curb guard from sand/dirt/Trash
56	no	no	no				in good condition from debris/Trash
57	no	no					in good condition from sticks/pebbles
58	yes	no	no	yes			Cleaned Boom from Trash/sand
60	yes					no	Cleaned Curb guard from debris/Trash
61	yes					no	Cleaned Curb guard from sand/grass
62	yes					no	Cleaned Curb guard from Rock/Trash

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/15/24

Signature:

Ronnell Harley

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	yes					no	Cleaned Curb guard from sticks/debris
64	yes					no	Cleaned curb guard from sand/trash
65	yes	no	no	yes			Cleaned Boom from grass/rocks
66	no						in good condition from dirt/debris
67	no		no	yes		no	Check for trash / debris inside in good condition from Trash dirt
68	no						Check for trash / debris inside Clean
69	no						Cleaned Boom from debris/trash/pebbles
70	yes	no	no	yes			Cleaned Boom from dirt/trash
71	yes	no	no	yes			Cleaned Boom from sand/sticks
72	yes	no	no	yes			Check for trash / debris inside Clean
73	no						in good condition from dirt/trash
74	no	no					Check for trash / debris inside Clean
75	no						Check for trash / debris inside Clean
76	no						Check for trash / debris inside Clean
77	no						Cleaned Boom from sand/debris
78	yes	no	no	yes			Cleaned Boom from trash/dirt
79	yes	no	no	yes			Check for trash / debris inside Clean
80	no						Cleaned Boom from rocks/sand/trash
81	yes	no	no	yes			Cleaned Boom from pebbles/rocks
82	yes	no	no	yes			Cleaned Boom from debris/dirt
83	yes	no	no	yes			

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/15/24

Signature:

Donnell Horley

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
87	yes		no	yes			Cleaned Boom from grass/sticks
95	yes	no	no	yes			Cleaned Boom from grass/dirt
96	no	no	no	yes			in good condition from debris/trash
97	no						in good condition from sand/rocks
98	yes	no	no	yes			Cleaned Boom from sticks/grass/dirt
99	no						Check for Trash / Debris Clean
100	yes		no	yes			Cleaned Boom from pebbles/sand
101	no	no					in good condition from dirt/debris
102	no						in good condition from debris/trash
103	no					no	in good condition from rocks/pebbles
104	yes						Cleaned Boom from Trash/dirt
107	no	no					in good condition from sand/debris
108	no	no					in good condition from debris/trash
108A	yes	no					Cleaned dirt/sand from around drain
108B	no						in good condition from sand/dirt/rocks
109					no		White Boom in good condition
110					no		White Boom in good condition

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/24/24

Signature:

Ronell Harey

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	no	no	no	yes			in good condition debris/dirt cleaned boom from sand/rocks
2	yes	no	no	yes			Check for trash / debris inside Clean
3	no						Check for trash / debris inside Clean
4	no						Check for trash / debris inside Clean
5	no						Check for trash / debris inside Clean
5a	no						Check for trash / debris inside Clean
6	no						Check for trash / debris inside Clean
6a	no						Check for trash / debris inside Clean
7	yes	no	no	yes			Cleaned Boom from dirt/Trash Clean
8	yes	no	no	yes			Cleaned Boom from Trash/Sand in good condition from grass/dirt
9	no	no	no	yes			Cleaned Boom from Trash/debris in good condition from grass/dirt
10	yes	no	no	yes			Cleaned Boom from debris/sticks in good condition from debris/sticks
11	no	no	no	yes			in good condition from Rocks/Trash in good condition from debris/pebbles
12	no	no	no	yes			in good condition from sand/sticks in good condition from sand/sticks
13	no	no	no	yes			in good condition from Rocks/dirt in good condition from Rocks/dirt
14	no	no	no	yes			in good condition from dirt/Sand cleaned Boom from dirt/Sand
15	no	no	no	yes			cleaned Boom from grass/sticks in good condition from dirt/debris
17	yes	no	no	yes			in good condition from Sand/Trash in good condition from Sand/Trash
18	yes	no	no	yes			in good condition from Trash/rocks in good condition from Trash/rocks
19	no	no					
20	no	no	no	yes			
21	no	no	no	yes			

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/24/24

Signature:

Ronnell Hardy

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	yes	no	no	yes			Cleaned boom from sand/rocks
24A	yes	no	no	yes			Cleaned boom from sand/sticks
25	yes		no	yes			Cleaned boom from grass/sticks
27	yes	no	no	yes			Cleaned boom from trash/dirt
28	yes	no	no	yes			Cleaned boom from debris/dirt
29	yes	no	no	yes			Cleaned boom from sand/sticks
30	no	no	no	yes			Inside Substation 41 Clean
37	yes	no	no	yes			Cleaned boom from rocks/petables
38	yes					no	Cleaned curb guard from dirt/debris
39	yes					no	Cleaned curb guard from sand/trash
40	yes					no	Cleaned curb guard from dirt/sand
41	no	no					in good condition from debris/dirt
42	no						in good condition from dirt/trash
43	no						in good condition from trash/debris
44	no						in good condition from sand/trash

\*January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/24/24

Signature:

Ronell Harty

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	no						Center drainage area clear? (Yes or No) <b>yes</b>
46	yes	no	no	yes			Cleaned Boom from debris/trash
47	yes	no	no	yes			Cleaned Boom from sand/sticks
48	yes	no	no	yes			Cleaned Boom from dirt/rocks
49	no						in good condition from trash/debris
50	no						Check for trash / debris inside
51	no	no					in good condition from sand/rocks
52	no	no	no	yes			inside Substation 7 Clean
53	yes		no	yes			Cleaned Boom from sand/dirt/pebbles
54	yes					no	Cleaned Curb guard from trash/debris
56	no	no	no				in good condition from debris/sand
57	no	no					in good condition from sticks/dirt
58	yes	no	no	yes			Cleaned Boom from Trash/sand/sticks
60	yes					no	Cleaned Curb guard from dirt/trash
61	yes					no	Cleaned curb guard from sand/rocks
62	yes					no	Cleaned curb guard from sticks/dirt

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/24/24

Signature:

Ronell Harley

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	yes					no	Cleaned <del>boom</del> from grass/stick
64	yes					no	Cleaned <del>boom</del> from sand/dirt
65	yes	no	no	yes			Cleaned boom from trash/debris
66	no						in good condition from dirt/trash
67	yes		no	yes			Check for trash / debris inside Cleaned dirt/trash
68	yes					no	Cleaned curb guard from sand/pebbles
69	no						Check for trash / debris inside Clean
70	yes	no	no	yes			Cleaned boom from sticks/dirt
71	yes	no	no	yes			Cleaned boom from trash/rocks
72	yes	no	no	yes			Cleaned boom from sand/pebbles
73	no						Check for trash / debris inside Clean
74	no	no					in good condition from debris/dirt
75	no						Check for trash / debris inside Clean
76	no						Check for trash / debris inside Clean
77	no						Check for trash / debris inside Clean
78	yes	no	no	yes			Cleaned boom from rocks/trash
79	yes	no	no	yes			Cleaned boom from pebbles/sand
80	no						Check for trash / debris inside Clean
81	yes	no	no	yes			Cleaned boom from dirt/trash
82	yes	no	no	yes			Cleaned boom from sticks/pebbles
83	yes	no	no	yes			Cleaned boom from dirt/debris

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

Signature:

7/24/24

Fornell Hardy

Inlet Number	Sediment Clean-up	Wich's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	yes		no	yes			Cleaned Boom from sand/dirt
95	yes	no	no	yes			Cleaned Boom from trash/debris
96	no	no	no	yes			in good condition from dirt/trash
97	no						in good condition from sand/rocks
98	yes	no	no	no			Cleaned Boom from sticks/debris
99	no						Check for Trash / Debris
100	yes		no	yes			Cleaned Boom from pebbles/sand
101	no	no					in good condition from debris/trash
102	no						in good condition from dirt/rocks
103	no						in good condition from sand/sticks
104	no					no	in good condition from sand/pebbles
107	no	no					in good condition from Trash/dirt
108	no	no					in good condition from debris/dirt
108A	no	no					in good condition from sand/trash
108B	no						in good condition from debris/dirt
109					no		White Boom in good condition
110					no		White Boom in good condition

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 7/30/24

Signature: *Carl Miller*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	No	No	No	Yes			CLEANED ALREADY
2	Yes	No	No	Yes			rotated boom, cleaned
3	No						Check for trash / debris inside CLEAN
4	No						Check for trash / debris inside CLEAN
5	No						Check for trash / debris inside CLEAN
5a	No						Check for trash / debris inside CLEAN
6	No						Check for trash / debris inside CLEAN
6a	No						in good condition
7	No	no	no	no			rotated boom no sediment
8	no	no	no	yes			all good
9	no	no	no	yes			no sediment to clean
10	no	no	no	yes			no sediment all clean
11	no	no	no	yes			no debris, clean
12	no	no	no	yes			good condition
13	no	no	no	yes			good condition
14	no	no	no	yes			CLEAN TRASH AROUND DRAIN
15	Yes	No	No	Yes			good condition
17	no	no	no	no			CLEAN PAPER AROUND DRAIN
18	Yes	No	No	Yes			all good, clear
19	no	no					rotated, no sediment
20	no	no	no	yes			good condition
21	no	no	no	no			

\*January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

7/30/24

Signature:

*Eric Allen*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
24	Yes	No	No	Yes			CLEANED TRASH AROUND DRAIN No debris area in good condition
24A							Cloth Cover area in good condition
25							CLEANED ALREADY
27							CLEANED ALREADY
28	Yes	No	No	Yes			CLEANED ALREADY
29	Yes	No	No	Yes			all good
30	Yes	No	No	Yes			CLEANED ALREADY
37	Yes	No	No	Yes			CLEANED ALREADY
38	Yes					No	CLEANED ALREADY
39	Yes					No	CLEANED ALREADY
40	Yes						area clear of debris
41							CLEANED ALREADY
42	Yes						CLEANED ALREADY
43	Yes						CLEANED ALREADY
44	Yes						CLEANED ALREADY

\* January, April, July, October

*Tim Dinnane*

PEPCO STORM DRAIN SHEET for DATE:

8/10/24

Signature:

*Ant M*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
45							Center drainage area clear? (Yes or No) <i>Yes</i>
46	<i>Yes</i>	<i>No</i>	<i>No</i>	<i>Yes</i>			<i>CLEANED ALREADY</i>
47	<i>Yes</i>	<i>No</i>	<i>No</i>	<i>Yes</i>			<i>CLEANED ALREADY</i>
48	<i>Yes</i>	<i>No</i>	<i>No</i>	<i>Yes</i>			<i>CLEANED ALREADY</i>
49	<i>Yes</i>						<i>all good, no debris</i>
50	<i>NO</i>						Check for trash / debris inside
51	<i>Yes</i>	<i>No</i>					<i>CLEAN</i>
52	<i>no</i>	<i>no</i>	<i>no</i>	<i>no</i>			Inside Substation 7
53	<i>no</i>		<i>no</i>	<i>no</i>			<i>no debris present</i>
54	<i>no</i>					<i>no</i>	<i>no debris up!</i>
56	<i>no</i>	<i>no</i>	<i>no</i>				<i>area clear and clear</i>
57	<i>Yes</i>	<i>No</i>		<i>Yes</i>			<i>CLEANED ALREADY</i>
58	<i>Yes</i>	<i>No</i>	<i>No</i>				<i>CLEANED ALREADY</i>
60	<i>Yes</i>					<i>No</i>	<i>CLEANED ALREADY</i>
61	<i>Yes</i>					<i>No</i>	<i>CLEANED ALREADY</i>
62	<i>Yes</i>					<i>No</i>	<i>CLEANED ALREADY</i>

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

8/16/24

Signature:

*[Signature]*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	Yes					NO	CLEANED DIRT AROUND DRAIN
64	Yes					NO	CLEANED DIRT AROUND DRAIN
65	Yes	NO	NO	Yes			CLEANED DIRT AROUND DRAIN
66	NO						no debris area clean
67	Yes		NO	NO		NO	Check for trash / debris inside CLEANED DIRT AROUND DRAIN
68	Yes						Check for trash / debris inside CLEANED
69	Yes						Check for trash / debris inside CLEANED DIRT AROUND DRAIN
70	Yes	NO	NO	Yes			CLEANED DIRT AROUND DRAIN
71	Yes	NO	NO	Yes			CLEANED DIRT AROUND DRAIN
72	Yes	NO	NO	Yes			Check for trash / debris inside CLEANED
73	NO						CLEANED AROUND DRAIN
74	Yes	NO					Check for trash / debris inside CLEANED
75	Yes						Check for trash / debris inside CLEANED
76	Yes						Check for trash / debris inside CLEANED
77	Yes						CLEVER trash AROUND DRAIN
78	Yes	NO	NO	Yes			NO debris area clean
79	NO	NO	NO	NO			Check for trash / debris inside
80	NO						no debris area clean
81	NO	NO	NO	NO			no debris area clean
82	NO	NO	NO	NO			all clear
83	NO	NO	NO	NO			

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

8/11/24

Signature:



Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	NO		NO	NO			all clear
95	NO	NO	NO	NO			in good condition
96	NO	NO	NO	NO			in good condition
97	NO						area cleaned before
98	NO	NO	NO	NO			all good / clear
99	NO						Check for Trash / Debris
100	NO		NO	NO			
101	YES	NO					
102	YES						NO debris to clean up
103	NO						cleaned dirt around drain
104	NO					NO	cleaned dirt around drain
107	NO	NO					All clear, no debris
108	NO	NO					in good condition
108A	NO	NO					in good condition
108B	NO						all clear, good condition
109					NO		good condition, no trash/debris
110					NO		area clear of debris

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

08-05-2024

Signature:

*J. J. J. J.*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced
1	✓					
2	✓					
3	✓					
4	✓					
5	✓					
5a	✓					
6	✓					
6a	✓		✓			
7	✓					
8	✓					
9	✓					
10	✓		✓			
11	✓					
12	✓					
13	✓		✓			
14	✓					
15	✓					
17	✓					
18	✓					
19	✓					
20	✓					
21	✓					

Comments

Condition good, swept sediments  
 Condition good dirt cleaned  
 Check for trash / debris inside free from debris  
 Check for trash / debris inside Yes  
 Check for trash / debris inside Yes  
 Check for trash / debris inside No trash inside  
 Check for trash / debris inside trash swept away  
 Check for trash / debris inside Boom cleaned and arranged  
 Condition good sediments/dirt swept away  
 Condition good Boom cleaned and rearranged  
 Condition good sediments swept clean  
 Boom clean and rearranged  
 Condition good dirt swept away  
 Condition good dirt swept away  
 Condition good sediments/dirt swept away  
 Condition good sediments/dirt swept away

\*January, April, July, October

Revision: July, 2023

PEPCO STORM DRAIN SHEET for DATE: *08-05-2024* Signature: *P. Smulder*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	✓						Condition good. dirt swept condition good.
24A	✓						Cloth Cover in place.
25	✓		✓				Condition good
27	✓		✓				sediment/ dirt swept away
28	✓						sediment and dirt swept
29	✓						couldn't get in
30	✓						Inside Substation 41
37	✓						Condition good, grass pulled out
38	✓						rocks/ dirt swept
39	✓						rocks and dirt swept
40	✓						sediments swept away
41	✓						sediments swept away
42	✓						swept. grass <del>per</del> pulled out
43	✓						condition good
44	✓						condition good

\* January, April, July, October

PEPCO STORM DRAIN SHEET for DATE:

08-05-2024

Signature:

*J. Tomback*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	✓						Center drainage area clear? (Yes or No) Condition good. dirt swept
46	✓		✓				condition good
47	✓						sediment swept away
48	✓						grass sweep from surroundings
49	✓						check for trash / debris inside
50	✓						yes
51	✓						set surroundings clean
52	✓						inside Substation 7
53	✓						couldn't get in
54	✓						condition good
56	✓						condition good
57	✓						condition good. Sediments swept
58	✓						condition good
60	✓						sediments and rocks swept
61	✓						sediments and rocks swept
62	✓						grass swept from surroundings

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 08-05-2024

Signature:

J. Fomale

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	✓						Condition good, grass swept. Rocks and sediments swept.
64	✓						dirt swept away.
65	✓						surroundings swept. changed filter
66	✓						Check for trash / debris inside
67	✓						Condition good. dirt swept away.
68	✓						Check for trash / debris inside
69	✓						surrounding swept clean
70	✓		✓				surroundings swept clean
71	✓						surroundings swept clean
72	✓						Check for trash / debris inside
73	✓						Condition good
74	✓						Check for trash / debris inside
75	✓						Check for trash / debris inside
76	✓						Check for trash / debris inside
77	✓						surroundings swept clean
78	✓						surroundings swept clean
79	✓						Check for trash / debris inside
80	✓						Condition is good
81	✓		✓				Boom cleaned, rearranged
82	✓						surroundings swept clean.
83	✓						

\* January, April, July, October

PEPCO STORM DRAIN SHEET for DATE:

08-05-2024

Signature:

Dr. Finkbein

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	✓						surroundings swept clean condition good
95	✓		✓				sediments swept clean
96	✓						boom cleared and arranged
97	✓						boom clean and fixed
98	✓		✓				Check for Trash / Debris Debris taken out
99	✓						boom rearranged
100	✓						surroundings swept clean
101	✓						boom surroundings swept
102	✓						condition good
103	✓						boom surroundings clean
104	✓						debris/rocks swept away
107	✓						boom surroundings swept
108	✓						condition good, dirt swept
108A	✓						rocks and debris swept
108B	✓						debris swept away
109							rocks and debris swept clean
110							

\* January, April, July, October

PEPCO STORM DRAIN SHEET for DATE: 08-12-24 / 08-13-24 Signature: Steven Moore

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	✓		✓				Drains' clean No debris
2	✓						Drain's clean No debris
3	✓						Check for trash / debris inside CLEAN No debris
4	✓						Check for trash / debris inside CLEAN No debris
5	✓						Check for trash / debris inside CLEAN No debris
5a	✓						Check for trash / debris inside CLEAN in and out
6	✓						Check for trash / debris inside CLEAN in and out
6a	✓						has stones but No debris and clean
7	✓						has stones but No debris
8	✓		✓				CLEAN in and out No debris
9	✓			✓			CLEAN in and out No debris
10	✓			✓			CLEAN in and out No debris
11	✓						CLEAN in and out No debris
12	✓						CLEAN No debris
13	✓						Drain CLEAN No debris
14	✓						CLEAN Drain and debris
15	✓			✓			Boom Around and No debris straight out
17	✓		✓				Boom Around No debris straight out
18	✓						CLEAN Drain From debris
19	✓						Boom Around No debris straight out
20	✓						Boom Around No debris
21	✓						

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 08-12-24

Signature: *[Signature]*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	✓						CLEAN Drain No debris
24A	✓						CLEAN Drain No debris
25	✓						Cloth Cover CLEAN cover and Drain
27	✓		✓				CLEAN Boom and debris
28	✓						CLEAN No debris
29	✓						CLEAN No debris
30	✓		✓				Inside Substation 41 CLEAN
37	✓						CLEAN No debris
38	✓						CLEAN No debris
39	✓						CLEAN Drain No debris
40	✓						CLEAN No debris
41	✓						CLEAN No debris
42	✓						CLEAN No debris
43	✓						CLEAN No debris
44	✓						CLEAN No debris

\*January, April, July, October

PEPCO STORM DRAIN SHEET for DATE: 08-12-24

Signature: Steve Mason

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	✓						Center drainage area clear? (Yes or No) Yes No debris
46	✓						CLEAN Drain No debris
47	✓		✓				CLEAN Drain No debris
48	✓						CLEAN Drain No debris
49	✓						CLEAN Drain
50	✓						Check for trash / debris inside CLEAN in out Drain
51	✓						Drain CLEAN
52	✓						Inside Substation 7 Drain CLEAN no debris
53	✓						CLEAN Drain Free debris
54	✓						Drain CLEAN and debris
56	✓						CLEAN Drain
57	✓						CLEAN No debris
58	✓						CLEAN No debris
60	✓						CHANGE CLEAN
61	✓						CHANGE Drain No debris
62	✓						CLEAN Drain No debris

\* January, April, July, October

PEPCO STORM DRAIN SHEET for DATE: 08-12-24

Signature: *Shane Moore*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	✓						DRAIN CLEAN No debris
64	✓						DRAIN CLEAN No debris
65	✓						DRAIN DRAIN No debris
66	✓						DRAIN CLEAN No debris
67	✓						Check for trash / debris inside CLEAN No debris
68	✓						CLEAN No debris
69	✓						Check for trash / debris inside CLEAN inside No debris
70	✓						CLEAN No debris
71	✓						CLEAN No debris
72	✓		✓				CLEAN No debris
73	✓						CLEAN No debris
74	✓						CLEAN No debris
75	✓						Check for trash / debris inside CLEAN
76	✓						Check for trash / debris inside CLEAN
77	✓						Check for trash / debris inside CLEAN
78	✓						CLEAN in and out No debris
79	✓		✓				CLEAN in and out No debris
80	✓						CLEAN in and out No debris
81	✓		✓				CLEAN in and out No debris
82	✓						CLEAN in and out No debris
83	✓						CLEAN in and out No debris

\*January, April, July, October

Revision: April 24, 2023



PEPCO STORM DRAIN SHEET for DATE: 08-12-24

Signature: *Steve Moore*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
87	✓						clean in and out no debris
95	✓		✓				clean in and out no debris
96	✓						clean in and out no debris
97	✓						clean in and out no debris
98	✓						clean in and out no debris
99	✓						check for trash / debris clean no debris
100	✓						drain clean no debris
101	✓						drain clean no debris
102	✓						drain clean no debris
103	✓						drain clean no debris
104	✓						clean 1 no debris
107	✓						drain clean no debris
108	✓						clean in and out no debris
109							clean in/out no debris
110							clean in and out no debris

\*January, April, July, October

PEPCO STORM DRAIN SHEET for DATE: 08-19-2024 Signature: J. Fontabell

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	✓		✓				dirt swept away. Condition good
2	✓						Condition good. dirt swept
3	✓						trash removed
4	✓						Check for trash / debris inside swept around
5	✓						Check for trash / debris inside No trash found
5a	✓						Check for trash / debris inside debris swept
6	✓						Trash swept away
6a	✓						Check for trash / debris inside Rocks cleared
7	✓						Sediments swept away
8	✓						Condition good. rocks swept
9	✓		✓				Debris and rocks swept away
10	✓						Boom cleared and surrounding
11	✓						grass cleared from surroundings
12	✓						Condition good. swept
13	✓						Sediments swept away.
14	✓		✓				Dirt removed from surroundings
15	✓						Booms cleared and replaced
17	✓						rocks and dirt removed
18	✓						Grass swept away from surroundings
19	✓						Condition good
20	✓						Sediments/dirt swept away
21	✓						Trash swept from surroundings.

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 08-19-2024

Signature:

*J. Finkbe*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	✓		✓				Boom removed and cleaned swept surroundings
24A	✓		✓				Cloth Cover Cover in good condition
25	✓						Dirt removed from surroundings
27	✓						Grass swept away
28	✓						Grass swept away
29	✓		✓				sediments swept away
30	✓						Inside Substation 41
37	✓						No Access
38	✓						sweepings swept clean
39	✓						Grass removed from surroundings
40	✓						Grass removed from surroundings
41	✓						Dirt and rocks removed
42	✓						sweep away dirt and grass
43	✓						in good condition. swept clean
44	✓						both rearranged and swept
							Dirt removed from surroundings
							get most swept away

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 08-019-2024

Signature:

*G. Fimbals*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	✓						Center drainage area clear? (Yes or No) Yes
46	✓						Condition good, swept clean
47	✓						Booms and dirt swept away
48	✓		✓				Sediments cleaned
49	✓						Grass and dirt swept away
50	✓						Check for trash / debris inside
51	✓						trash swept
52	✓						surroundings kept clean
53	✓		✓				Inside Substation 7
54	✓						No Access
56	✓						Condition good, no dirt
57	✓						Booms swept and arranged
58	✓						Condition great.
60	✓						surroundings swept clean
61	✓						Grass and dirt swept away
62	✓						Condition good, surroundings clean
							Sediment swept clean
							Dirt and trash swept away

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 08-019-2024

Signature:

*P. Spink*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	✓						Curb guard condition good Sweep around curb guards condition good.
64	✓						grass and dirt swept away.
65	✓						Check for trash / debris inside
66	✓						in good condition, dirt swept away
67							Check for trash / debris inside
68							debris swept away
69							sediment swept clean
70			✓				Rock and sediments swept away
71							Grass swept away
72							Grass swept away
73							Check for trash / debris inside
74							Grass swept away
75							Dirt and Grass swept away
76							Debris removed
77							Check for trash / debris inside
78			✓				Grass removed
79							Check for trash / debris inside
80							Surroundings swept
81							Surroundings swept clean
82			✓				Check for trash / debris inside
83							Surroundings swept

\*January, April, July, October

Revision: July, 2023



PEPCO STORM DRAIN SHEET for DATE:

08-19-2024

Signature:

D. Fomela

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87							Boom swept clean and rearranged surroundings swept clean
95			✓				Grass and dirt swept away
96							Boom cleared and rearranged
97							In good condition. clean
98							Check for trash / Debris
99			✓				Grass and debris swept clean
100							In good condition
101							In good condition; swept
102							Rocks and sediments swept clean
103							Boom removed and rearranged
104							Grass and dirt cleaned
107							In good condition; swept
108							Rocks and grass swept
108A							Dirt swept away
108B							In good looking condition
109							Rocks and sediments swept.
110							

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

08-26-2024

Signature:

Lenelo Aguirre y Particio Alvarado

08-28-2024 Wilma Redolfo

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced
1	✓					
2	✓					
3	✓					
4	✓					
5.14	✓					
5a	✓					
6	✓					
6a	✓					
7	✓		✓			
8	✓					
9	✓					
10	✓					
11	✓		✓			
12	✓		✓			
13	✓					
14	✓		✓			
15	✓		✓			
16	✓		✓			
18	✓					
19	✓					
20	✓		✓			
21	✓		✓			

Comments

Drain cleared no debris  
 green boom in good condition  
 es-7a en buenas condiciones los green boom  
 Check for trash / debris inside Clean no debris  
 Check for trash / debris inside Boom in good condition  
 Check for trash / debris inside Clean no debris  
 Check for trash / debris inside cleaned no debris  
 Check for trash / debris inside cleaned no debris  
 has stone but no debris  
 clean in and out no debris  
 clean in and out no debris  
 Drain clean in and out no debris  
 Drain clean in and out no debris  
 Drain clean in and out no debris  
 All good, green boom in good condition  
 es-7a bien los green boom  
 All good, green boom in good condition  
 es-7a bien los green boom  
 Boom around no debris straight out

\* January, April, July, October

Revision: July, 2023



PEPCO STORM DRAIN SHEET for DATE: 08-26-2024

Signature: Conelio Aguirre y Porfirio Alvarado

08-28-2024 Wilms Rodello

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	✓		✓				Cleaned drain no debris
24A	✓						Cleaned drain no debris
25	✓						Cloth cover clean cover and drain
26	✓						All good green boom in good condition
27	✓		✓				Todo esta bien el boom esta bien
28	✓						All good green boom in good condition
29	✓						Todo esta bien el boom esta bien
30	✓		✓				Clean no debris
31	✓						Inside Substation 41
32	✓						Clean
33	✓						Todo esta bien el boom esta bien
34	✓						Drain clean no debris
35	✓						Drain cleaned no debris
36	✓						Drain cleaned no debris
37	✓						Drain cleaned no debris
38	✓						Drain clean no debris
39	✓						Drain clean no debris
40	✓						Drain clean no debris
41	✓						Drain clean no debris
42	✓						Drain clean no debris
43	✓						Drain clean no debris
44	✓						Drain clean no debris

\* January, April, July, October

PEPCO STORM DRAIN SHEET for DATE: 08-26-2024 Signature: \_\_\_\_\_

Cornelio Aguirre y Porfirio Alvarado

08-28-24, Mrs. Rodolfo  
NO Comments

Inlet Number	Sediment Clean-up	Whitch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	✓						Center drainage area clear? (Yes or No) <u>Debris</u> clean drain no debris
46	✓		✓				clean drain no debris
47	✓						clean drains no debris
48	✓						clean drain no debris
49	✓						clean drain no debris
50	✓						Check for trash / debris inside <u>clean in arpo drain</u>
51	✓						<u>Drain clean</u>
52	✓		✓				Inside Substation <u>Drain clean no debris</u>
53	✓						clean drains no debris
54	✓						Drain clean and debris
56	✓						clean drain no debris
57	✓						clean no debris
58	✓		✓				All good with green boom Todo bien con Green Boom
60	✓						Drain clean no debris
61	✓						clean drain no debris
62	✓						clean drain

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: **08-26-2024** Signature: \_\_\_\_\_

**Caroleo Aguirre y Porfirio Alvarado**

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	✓						Drain clean no debris
64	✓						Drain clean no debris
65	✓						Drain clean no debris
66	✓						Check for trash / debris inside
67	✓						Drain clean no debris
68	✓						Check for trash / debris inside
69	✓						Check for trash / debris inside
70	✓						Check for trash / debris inside
71	✓						Check for trash / debris inside
72	✓						Check for trash / debris inside
73	✓						Check for trash / debris inside
74	✓						Check for trash / debris inside
75	✓						Check for trash / debris inside
76	✓						Check for trash / debris inside
77	✓						Check for trash / debris inside
78	✓						Check for trash / debris inside
79	✓						Check for trash / debris inside
80	✓						Check for trash / debris inside
81	✓						Check for trash / debris inside
82	✓						Check for trash / debris inside
83	✓						Check for trash / debris inside

\*January, April, July, October

Revision: July, 2023



PEPCO STORM DRAIN SHEET for DATE: 08-28-2024 Signature: Wilmer Ortiz

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	✓						clean in and out no debris
95	✓		✓				clean in out no debris
96	✓		✓				clean in out no debris
97	✓		✓				clean in out no debris
98	✓						Check for Trash / Debris clean no debris
99	✓						Drain clean no debris
100	✓						Drain clean no debris
101	✓						bad condition
102							Drain clean no debris
103	✓						Drain clean no debris
104	✓						Drain cleaned no debris
107	✓						Drain cleaned no debris
108	✓						Drain cleaned no debris
108A	✓						Drain cleaned no debris
108B	✓						Drain cleaned no debris
109							Drain cleaned no debris
110							Drain cleaned no debris

\* January, April, July, October

Jim Dindane

PEPCO STORM DRAIN SHEET for DATE: 09-04-24

Signature:

KEVIN GREEN

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	✓	NO	NO	yes			Drain good condition Swept up around drain area
2	✓	NO	NO	yes			Check for trash / debris inside Clean
3	✓						Check for trash / debris inside Swept up around drain
4	✓						Check for trash / debris inside Swept up around area
5	✓						Check for trash / debris inside Swept up around
5a	✓						Check for trash / debris inside Clean
6	✓						Check for trash / debris inside Clean
6a	✓						Drain in good condition Cleaned around area
7	✓	NO	NO	yes			Drain in good condition Picked up trash from area
8	✓	NO	NO	yes			Picked up from area
9	✓	NO	NO	yes			Swept up light sediment
10	✓	NO	NO	yes			Drain in good condition
11	✓	NO	NO	yes			Drain in good condition
12	✓	NO	NO	yes			Drain in good condition
13	✓	NO	NO	yes			Drain in good condition
14	✓	NO	NO	yes			Swept up around area
15	✓	NO	NO	yes			Drain in good condition
17	✓	NO	NO	yes			Swept up around area
18	✓	NO	NO	yes			Drain in good condition
19	✓	NO	NO	yes			Swept up light sediment
20	✓	NO	NO	yes			Picked up trash from around drain
21	✓	NO	NO	yes			

\*January, April, July, October

Revision: July, 2023

CBK



PEPCO STORM DRAIN SHEET FOR DATE: 08-04-24

Signature: Fern Peterson

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	✓	NO	NO	yes			Drain in good condition swept around Drain
24A	✓	NO	NO	yes			Cloth Cover Clean Boom
25	✓		NO	yes			Drain in good condition
27	✓	NO	NO	yes			Drain in good condition
28	✓	NO	NO	yes			Swept light sediment
29	✓	NO	NO	yes			Inside Substation 41 Clear
30	✓	NO	NO	yes			Swept up light sediment
37	✓	NO	NO	yes			Swept up light sediment
38	✓						Swept up light sediment
39	✓						Drain in good condition
40	✓						Drain in good condition
41	✓	NO					Swept up around area
42	✓						Swept up around area
43	✓						Swept up around area
44	✓						Swept up around area

\* January, April, July, October

CPH

PEPCO STORM DRAIN SHEET for DATE: 04-04-24

Signature:

04/04/24 EDEM GELKOV

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87			NO	yes			'Swept up around area '1'
95		NO	NO	yes			'Swept up around area'
96		NO	NO	yes			Swept up around area
97							Swept up around area
98		NO	NO	yes			Swept up around area
99							Check for Trash / Debris
100			NO	yes			Swept up, cleaned around area
101		NO					Swept up cleaned area
102							Swept up cleaned around area
103							Swept up cleaned area
104							Swept up area
107		NO					Swept up cleaned area
108		NO					Swept up around area
108A		NO					Swept up around area
108B							Swept up around area
109							Swept up around area
110							cleaned up area

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 04-04-24

Signature:

T. DEH GIBSON

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	✓						Swept up light sediment
64	✓						Swept up light sediment
65	✓	NO	NO	yes			Swept up light sediment
66	✓						Drain in good condition
67	✓		NO	yes			Check for trash / debris inside
68	✓						Swept up around drain
69	✓						Check for trash / debris inside
70	✓	NO	NO	yes			Swept up heavy sediment
71	✓	NO	NO				Swept up around area
72	✓	NO	NO				Swept up light sediment
73	✓						Check for trash / debris inside
74	✓						Clean
75	✓						Drain in good condition
76	✓						Check for trash / debris inside
77	✓						Clean
78	✓						Check for trash / debris inside
79	✓						Swept up around area
80	✓						Swept up around area
81	✓						the put grave on it
82	✓						Check for trash / debris inside
83	✓						Clean

\*January, April, July, October

Revision: July, 2023



PEPCO STORM DRAIN SHEET for DATE: 09-04-24 Signature:

TREN GALEKON

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	yes						Center drainage area clear? (Yes or No) <u>yes</u> Swept up light sediment
46	yes	No	No	yes			Swept up around area
47	yes	No	No	yes			Swept up around area
48	yes	No	No	yes			Drain in good condition
49	yes						Check for trash / debris inside <u>clean</u>
50	yes						Drain in good condition
51	yes	No					Inside Substation 7 Swept up
52	yes	No	No	yes			Drain in good condition
53	yes		No	yes			Drain in good condition
54	yes						Swept up heavy sediment
56	yes	No	No				Drain in good condition
57	yes	No					Swept up light sediment
58	yes	No	No	yes			Picked up heavy sediment
60	yes						Drain in good condition
61	yes						Swept around Drain area
62	yes						

\* January, April, July, October

PEPCO STORM DRAIN SHEET for DATE: 09-09-24

Signature:

Julius Fombah

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	✓	NO	NO	YES			clean, soil swept sediment swept away
2	✓	NO	NO	YES			check for trash / debris inside NO trash inside
3	✓						check for trash / debris inside clean / free from trash
4	✓						check for trash / debris inside No trash inside
5	✓						check for trash / debris inside No debris. Rocks on top
5a	✓						check for trash / debris inside Rock up top
6	✓						check for trash / debris inside grass swept from top
6a	✓						check for trash / debris inside Rocks on the top
7	✓	NO	NO	YES			NO Access
8	✓	NO	NO	YES			in the gate. no access
9	✓	NO	NO	YES			sweep clean
10	✓	NO	NO	YES			debris and trash swept away
11	✓	NO	NO	YES			NO access
12		NO	NO	YES			NO Access
13	✓	NO	NO	YES			NO Access
14	✓	NO	NO	YES			NO Access
15	✓	NO	NO	YES			soil and debris swept away
17	✓	NO	NO	YES			sediment swept away
18	✓	NO	NO	YES			removed debris
19	✓	NO					cleaned area
20	✓	NO	NO	YES			cleaned area
21	✓	NO	NO	YES			

\* January, April, July, October

Revision: July, 2023

CPH



PEPCO STORM DRAIN SHEET for DATE: 09-09-24

Signature: Julius Simbala

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
24	✓	NO	NO	YES			Sweep around boom sediment and dust. Sweep
24A	✓	NO	NO	YES			in good condition.
25	✓		NO	YES			Boom in good condition
27	✓	NO	NO	YES			Grass removed from top
28	✓	NO	NO	YES			debris removed
29	✓	NO	NO	YES			
30		NO	NO	YES			Inside Substation 41
37	✓	NO	NO	YES		NO	No Access
38	✓					NO	Sweep grass around.
39	✓					NO	Curb guard still in good condition
40	✓					NO	Sweep clean and rearranged
41	✓	NO					rocks removed from the top
42	✓						sediments swept away
43	✓						rocks thrown over top
44	✓						rocks thrown over top.

\* January, April, July, October

CBT



PEPCO STORM DRAIN SHEET for DATE:

09-09-2024

Signature:

Jelena Tomchak

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	✓						Center drainage area clear? (Yes or No) <b>Yes</b>
46	✓	NO	NO	YES			Condition is good
47	✓	NO	NO	YES			Boom is in good condition
48	✓	NO	NO	YES			Sediment is swept
49	✓						Trash swept away
50	✓						Check for trash / debris inside
51	✓	NO					Sediments and rocks swept
52	✓	NO	NO	YES			Inside Substation 7
53	✓		NO	YES		NO	No Access
54	✓						Sediments swept away
56	✓	NO	NO				clut and sediments swept
57	✓	NO					Boom swept and rearranged
58	✓	NO	NO	YES			NOOP around boom
60	✓					NO	Swept around boom
61	✓					NO	Boom rearranged
62	✓					NO	clut swept away
							Sediments swept away

\* January, April, July, October

CPAT



PEPCO STORM DRAIN SHEET for DATE: 09-09-24

Signature:

Julius Fontana

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	✓					NO	In good condition
64	✓					NO	Trash removed from top
65	✓	NO	NO	YES			Surroundings swept clean
66	✓						Dirt and grass removed
67	✓		NO	YES		NO	No trash found
68	✓						Condition is good
69	✓						Check for trash / debris inside
70	✓	NO	NO	YES			No trash or debris
71	✓	NO	NO	YES			Swept trash around boom
72	✓	NO	NO	YES			Swept clean
73	✓						Trash and dirt swept clean
74	✓	NO					Check for trash / debris inside
75	✓						Condition is good. Swept
76	✓						Check for trash / debris inside
77	✓						Trash removed
78	✓	NO	NO	YES			Check for trash / debris inside
79	✓	NO	NO	YES			No debris
80	✓						Check for trash / debris inside
81	✓	NO	NO	YES			Trash swept away
82	✓	NO	NO	YES			Debris swept away
83	✓	NO	NO	YES			Check for trash / debris inside
							Sediments and rocks removed
							Net found
							Rocks and sediments swept.

\*January, April, July, October

Revision: July, 2023

CB&F



PEPCO STORM DRAIN SHEET for DATE: 09-09-24

Signature:

*Julius Zombaki*

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	✓		NO	<del>YES</del> YES			in good condition; swept rocks and debris swept rocks swept away boom repositioned and swept sediments swept away.
95	✓	NO	NO	YES			Check for trash / Debris trash taken out rocks and dirt swept away trash swept from surrounding trash and grass swept away
96	✓	NO	NO	YES			Curb guard replaced
97	✓						rocks up top sediments cleaned in good condition
98	✓	NO	YES	YES			rocks up top sediments swept away dirt and grass swept
99	✓						
100	✓		NO	<del>YES</del>			
101	✓	NO					
102	✓						
103	✓						
104	✓						
107	✓	NO					
108	✓	NO					
108A	✓	NO					
108B	✓						
109					NO		
110					NO		

\* January, April, July, October

CB&K



PEPCO STORM DRAIN SHEET for DATE:

9/17/24

Signature:

Ronell Harley

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	yes	no	no	yes			Cleaned Boom from trash/debris in good condition from sand/dirt
2	no	no	no	yes			Check for trash / debris inside Clean
3	no						Check for trash / debris inside Clean
4	no						Check for trash / debris inside Clean
5	no						Check for trash / debris inside Clean
5a	no						Check for trash / debris inside Clean
6	no						Check for trash / debris inside Clean
6a	no						Check for trash / debris inside Clean
7	yes	no	no	yes			Cleaned Boom from Trash/grass
8	yes	no	no	yes			Cleaned Boom from Sand/pepper
9	no	no	no	no			in good condition from debris/trash cleaned Boom from Trash/Rocks
10	yes	no	no	yes			in good condition from debris/dirt
11	no	no	no	yes			in good condition from pebbles/Rocks
12	no	no	no	yes			in good condition from dirt/Trash
13	no	no	no	yes			in good condition from Sand/dirt
14	no	no	no	yes			Cleaned Boom from sand/dirt
15	yes	no	no	yes			Cleaned Boom from dirt/Trash
17	yes	no	no	yes			in good condition from debris/dirt
18	no	no	no	yes			in good condition from Trash/debris
19	no	no					in good condition from Sand/Rocks
20	no	no	no	yes			in good condition from debris/Trash
21	no	no	no	yes			

\* January, April, July, October

Revision: July, 2023



PEPCO STORM DRAIN SHEET for DATE:

9/17/24

Signature:

Pomell Hartley

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
24	yes	no	no	yes			Cleaned Boom from grass/sand
24A	yes	no	no	yes			Cleaned Boom from Rocks/petals
25	no		no	yes			Cloth Cover in good condition from dirt/trash
27	yes	no	no	yes			Cleaned Boom from grass/sticks
28	no	no	no	yes			in good condition from debris/dirt
29	yes	no	no	yes			Cleaned Boom from Rocks/petals
30	no	no	no	yes			Inside Substation 41 Clean
37	no	no	no	yes		no	in good condition from Trash/Sticks
38	yes					no	Cleaned curb guard from Rocks/dirt
39	yes					no	Cleaned curb guard from Trash/debris
40	yes					no	Cleaned Curb guard from Sand/Trash
41	no	no					in good condition from Trash/debris
42	no						in good condition from dirt/Trash
43	no						in good condition from Rocks/petals
44	no						in good condition from Trash/debris

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

9/17/24

Signature:

Ronell Hardy

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	no						Center drainage area clear? (Yes or No) Clean
46	yes	no	no	yes			Cleaned Boom Trash/dirt
47	yes	no	no	yes			Cleaned Boom Rocks pebbles
48	no	no	no	yes			Cleaned Boom Trash/debris
49	no						in good condition from debris/dirt
50	no						Check for trash / debris inside Clean
51	no	no					in good condition from sand/pebbles
52	no	no	no	yes			inside Substation 7 Clean
53	no		no	yes			in good condition from dirt/sticks
54	no					no	Cleaned Curb guard from rocks/sticks
56	no	no	no				in good condition from Trash/dirt
57	no	no					in good condition from leaves/sticks
58	no	no	no	no			in good condition from debris/grass
60	yes					no	Cleaned Curb guard Trash/debris
61	yes					no	Cleaned Curb guard Rocks/pebbles
62	yes					no	Cleaned Curb guard leaves/dirt

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE:

9/17/24

Signature:

Rennell Harley

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation *	White Boom Replaced	Curb Guard Replaced	Comments
63	NO					no	Cleaned Curb guard from leaves/sticks
64	no					no	in good condition from Rocks/dirt
65	yes	no	no	yes			Cleaned Boom from Trash/debris
66	no						in good condition from sand/Trash
67	no		no	yes		no	Check for trash / debris inside Clean
68	no						in good condition from dirt/sand
69	no						Check for trash / debris inside Clean
70	yes	no	no	yes			Cleaned Boom from Rocks/sand
71	yes	no	no	yes			Cleaned Boom from Trash/debris
72	yes	no	no	yes			Cleaned Boom from debris/dirt
73	no						Check for trash / debris inside Clean
74	no	no					Check for trash / debris inside Clean
75	no						Check for trash / debris inside Clean
76	no						Check for trash / debris inside Clean
77	no						Cleaned Boom from Rocks/petables
78	yes	no	no	yes			in good condition from sand/Trash
79	no	no	no	yes			Check for trash / debris inside Clean
80	no						in good condition from Rocks/Trash
81	no	no	no	yes			in good condition from debris/dirt
82	no	no	no	yes			Cleaned Boom from Trash/debris
83	yes	no	no	yes			

\* January, April, July, October

Revision: July, 2023



PEPCO STORM DRAIN SHEET for DATE:

9/17/24

Signature:

Bonnell Healey

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87	no		no	yes			in good condition Trash/debris
95	yes	no	no	yes			in good condition dirt/Trash
96	yes	no	no	yes			in good condition from grass/rocks
97	no						in good condition from pebbles/grass
98	no	no	no	yes			in good condition from sticks/dirt
99	no						Check for Trash / Debris Clean
100	yes		no	yes			Cleaned boom from Trash/debris
101	yes	no					in good condition from debris/sticks
102	no						in good condition from rocks/pebbles
103	no						in good condition from sand/dirt
104	no					no	in good condition from dirt/Trash
107	yes	no					cleaned boom from sand/rocks
108	no	no					in good condition from trash/sand
108A	no	no					in good condition from sand/dirt
108B	no						in good condition from dirt/Trash
109					no		in good condition from trash/rocks
110					no		in good condition from debris/dirt

\* January, April, July, October



PEPCO STORM DRAIN SHEET for DATE: 09-24-24 Signature: EDEN C. BEKON

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
1	NO	NO	NO	Yes			Swept up sediment around area
2	Yes	NO	NO	Yes			Swept up sediment from grass
3	Yes						Check for trash / debris inside Swept up
4	Yes						Check for trash / debris inside Swept up
5	NO						Check for trash / debris inside NO Acces
5a							Check for trash / debris inside NO Acces
6							Check for trash / debris inside NO Acces
6a							Check for trash / debris inside NO Acces
7							NO Acces
8							NO Acces
9							NO Acces
10							NO Acces
11							NO Acces
12							Swept up around area
13							picked up light sediment
14	NO	NO	NO	NO			Drain good condition
15							cleaned boom / Swept up
17	Yes	NO	NO	Yes			picked up sediment around
18	Yes	NO	NO	Yes			Swept up around area
19	Yes	NO					Swept up heavy sediment
20	NO	NO	NO	Yes			Swept
21	NO	NO	NO	Yes			clean / Swept

\* January, April, July, October

Revision: July, 2023

CBT



PEPCO STORM DRAIN SHEET for DATE:

09-24-24

Signature:

EDEN CIBERON

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Room Replaced	Green Room Rotation*	White Room Replaced	Curb Guard Replaced	Comments
24	NO	N/O	N/O	Yes			Drain in good condition Swept up around Drain area
24A	N/O	N/O	N/O	Yes			Cloth Cover clean team
25	Yes		Yes	N/O			Drain still in good condition
27	N/O	N/O	N/O	Yes			Drain in good condition
28	NO	N/O	NO	Yes			Swept light Sediment
29	N/O	NO	NO	Yes			clean / Swept area
30	N/O	NO	N/O	N/O			Inside Substation 41
37	Yes	NO	N/O	Yes			Swept up light Sediment
38	N/O						Swept up light Sediment
39	N/O						Drain in good condition
40	N/O						Drain still good
41	N/O	N/O					Swept up around area
42	N/O						Swept up around area
43	NO						Swept up around drain area
44	N/O						Swept up light sediment

\*January, April, July, October

Revision: July, 2023

CP 410

PEPCO STORM DRAIN SHEET for DATE: 09-24-24

Signature:

ELSEN GIBSON

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
45	No						Center drainage area clear? (Yes or No) Yes
46	No	No	No	Yes			Swept up light sediment
47	No	No	No	Yes			Drain in good condition
48							Swept up around
49							Drain in good condition
50							Check for trash / debris inside clean
51	No						Drain in good condition
52							Still good
53							Inside Substation 7
54	No					No	Drain in good condition
56							Drain in good condition
57							Swept up heavy sediment
58							Swept up light sediment
60	No					No	Swept up light sediment
61	No					No	Picked up light sediment
62	No					No	Swept up around sediment

\* January, April, July, October

CPDR



PEPCO STORM DRAIN SHEET for DATE: 09-24-24

Signature: E. DEN GREKOR

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
63	NO					NO	Swept up light sediment
64	NO					NO	Picked up light sediment
65	yes	NO	NO	NO			cleared boom
66	yes						in good condition from debris
67	yes		NO	yes			Check for trash / debris inside in good condition
68	yes						cleaned curb from rock
69	yes						Check for trash / debris inside clean
70	NO	NO	NO	yes			clean boom from trash / dirt
71	yes	NO	NO	yes			clean boom from sand
72	yes	NO	NO	yes			in good condition
73	yes						Check for trash / debris inside clean
74	yes	NO					Picked up heavy sediment
75	yes						Check for trash / debris inside Swept up around
76	yes						Check for trash / debris inside clean
77	NO						Swept up around drain area
78	NO	NO	yes	yes			Swept up around drain area
79	NO	NO	NO	NO			Check for trash / debris inside Clean around (replaced)
80	NO						NO Access / grade unit
81	NO	yes	NO	yes			NO Access / grade on it
82	NO	yes	NO	yes			NO Access
83	NO	NO	yes	NO			

\*January, April, July, October

Revision: July, 2023

CDH



PEPCO STORM DRAIN SHEET for DATE: 09-24-24

Signature:

EDEN GREEN

Inlet Number	Sediment Clean-up	Witch's Hat Replaced	Green Boom Replaced	Green Boom Rotation*	White Boom Replaced	Curb Guard Replaced	Comments
87							
95							
96							
97							
98							
99							
100							
101							
102							
103							
104							
107							
108							
108A							
108B							
109							
110							

Check for Trash / Debris

No Acces

\* January, April, July, October

CAF

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

### Monthly Site Inspections

The site-wide inspection logs for July - September 2024 are attached. Additionally, The SWPPP monthly inspections for Facilities from April – June 2024 were not present in the Q2 report and have been included in this submittal. Benning operating areas continue to implement best management practices at the site including weekly inspection and maintenance of storm drain inlets, removing equipment and materials that are no longer in use from the site to eliminate exposure to stormwater, covering or moving indoors equipment that has the potential to contribute to pollutant loading, street sweeping, site walk-downs to identify any needed infrastructure repairs, quarterly management walk-downs to verify O&M controls, and supervision of the contractors working at the site to ensure they practice good housekeeping. Pepco also actively reviews the findings from weekly and monthly stormwater inspections to follow up on any actions needed.

The storage shed constructed in accordance with Paragraph 53 of the Consent Decree continues to operate as designed for temporary storage of off-line and removed from service transformers and other electrical equipment while awaiting recycling or disposal.

The site continues to perform inspections after rain events greater than 0.5 inches and follows up with corrective actions as may be needed based on those inspections.

The following projects completed in the 3<sup>rd</sup> Quarter 2024 reduced the potential contribution of metals to stormwater discharged from the site:

- Rotation and replacement of witches' hats and green booms continued. These inlet controls were installed in the last few years for improved TSS and metals removal.
- Monitoring and maintenance of Stormexx and Abtech units continued. The Stormexx and Abtech units were installed in the last few years for improved TSS and metals removal.
- Monitoring and maintenance of Jellyfish filter units continued. Washing of the filter cartridge "tentacles" was performed in the 3<sup>rd</sup> quarter 2024. Inlet bays in all Jellyfish and Stormfilter units were cleaned as well.

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities

Inspection Date & Time: 4/18/24

Inspector Name: Erick

Inspector's Signature: Erick

PHI	SE Corner Parking Area (FM-1)		South of Sub 7 Parking Area (FM-2)		Credit Union Parking Area (FM-3)		Bldg 44 Parking Area (FM-4)		Central Parking Area (FM-5)		Bldg 59 Parking Areas (FM-7)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>													
Are trash dumpsters closed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Is the site free of litter and debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Illicit Discharges</b>													
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Construction Activities</b>													
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>													
Are there items that require follow-up?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	



**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities      Inspection Date & Time: 4/18/24  
 Inspector Name: Eric Soto      Inspector's Signature: [Signature]

PHI	Front Gate Contractor Yard (FM-8)		South of Sub 45 Contractor Yard Area (FM-10)		Building 36 (FM-9)		Salt Shed (FM-6)		Building 38 Fire Pump House (FM-11)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are trash dumpsters closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Do spill kits contain the proper tools and equipment?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Have all spills been properly cleaned up and disposed of properly in the respective area?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Salt Handling</b>											
Are salt bales in good condition and located at entrance of shed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Corrective Actions</b>											
Are there items that require follow-up?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities      Inspection Date & Time: 5/22/24  
 Inspector Name: ESFC      Inspector's Signature: [Signature]

PHI	Front Gate Contractor Yard (FM-8)		South of Sub 45 Contractor Yard Area (FM-10)		Building 36 (FM-9)		Salt Shed (FM-6)		Building 38 Fire Pump House (FM-11)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are trash dumpsters closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Do spill kits contain the proper tools and equipment?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Have all spills been properly cleaned up and disposed of properly in the respective area?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Salt Handling</b>											
Are salt bales in good condition and located at entrance of shed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Corrective Actions</b>											
Are there items that require follow-up?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	


**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities

Inspection Date & Time: 5/22/24

Inspector Name: Eric

Inspector's Signature: [Signature]

	SE Corner Parking Area (FM-1)	South of Sub 7 Parking Area (FM-2)	Credit Union Parking Area (FM-3)	Bldg 44 Parking Area (FM-4)	Central Parking Area (FM-5)	Bldg 59 Parking Areas (FM-7)	Comments
	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are trash dumpsters closed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Is the site free of litter and debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Illicit Discharges</b>							
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Construction Activities</b>							
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>							
Are there items that require follow-up?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	



**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities      Inspection Date & Time: 6/27/24  
 Inspector Name: Eric      Inspector's Signature: [Signature]

PHI	SE Corner Parking Area (FM-1)	South of Sub 7 Parking Area (FM-2)	Credit Union Parking Area (FM-3)	Bldg 44 Parking Area (FM-4)	Central Parking Area (FM-5)	Bldg 59 Parking Areas (FM-7)	Comments
	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>							
Are trash dumpsters closed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Is the site free of litter and debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Illicit Discharges</b>							
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Construction Activities</b>							
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>							
Are there items that require follow-up?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities      Inspection Date & Time: 6/27/24  
 Inspector Name: Eric      Inspector's Signature: [Signature]

PHI	Front Gate Contractor Yard (FM-8)		South of Sub 45 Contractor Yard Area (FM-10)		Building 36 (FM-9)		Salt Shed (FM-6)		Building 38 Fire Pump House (FM-11)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are trash dumpsters closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Do spill kits contain the proper tools and equipment?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Have all spills been properly cleaned up and disposed of properly in the respective area?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Salt Handling</b>											
Are salt bales in good condition and located at entrance of shed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Corrective Actions</b>											
Are there items that require follow-up?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Environmental Operations

Inspection Department: Environmental Operations

Inspection Date & Time: 7/25/2024 9:45

Inspector Name: James Davis

Inspector's Signature: James Davis



Comments

	Lot 800 (PL-1)		Soil Storage / OWS Building / Hot Spot 4 Area (EO-5)		Water Treatment Trailer (EO-4)		Retention Pond Spare Frac Tank Area (EO-7)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>									
Is the site free of litter and debris?	✓		✓		✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?			✓						
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓	
<b>Material Storage / Infrastructure</b>									
Are soil storage areas covered and protected from precipitation?	N/A			✓					
Is the area around the soil storage free of material that could mingle with stormwater?	N/A		✓						
Are there building or infrastructure that is rusting or in poor condition?	N/A			✓		✓		✓	
<b>Spill Prevention &amp; Response</b>									
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?						✓		✓	
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		
<b>Other Indicators of Illicit Discharges</b>									
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		
<b>Construction Activities</b>									
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓		✓	
<b>Corrective Actions</b>									
Are there items that require follow-up?		✓		✓		✓		✓	



**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Environmental Operations**

Inspection Department: Environmental Operations

Inspection Date & Time: 7/25/24 10:15

Inspector Name: JAMES DUBS

Inspector's Signature: [Signature]



	Building 68 Outside (EO-1)		Building 67 Outside Areas (EO-2)		Material Storage Area (NW of Sub 7) (EO-6)		OW Separator (SE of Bldg 75) (EO-3)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>									
Is the site free of litter and debris?	✓		✓		✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?	✓								
<b>Material Storage / Infrastructure</b>									
Are containment booms in place and in good condition?					✓		✓		
Are all containers labeled with contents on the appropriate label?	✓		✓				✓		
Are any transformers not stored under cover, leaking, or in poor condition?				✓					
Are there building or infrastructure that is rusting or in poor condition?		✓		✓		✓		✓	
<b>Spill Prevention &amp; Response</b>									
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓						✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		
<b>Other Indicators of Illicit Discharges</b>									
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?		✓		✓		✓		✓	
<b>Construction Activities</b>									
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓		✓	
<b>Corrective Actions</b>									
Are there items that require follow-up?		✓		✓		✓		✓	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Environmental Operations

Inspection Department: Environmental Operations

Inspection Date & Time: 8/22/2024 10:15

Inspector Name: James Diaz

Inspector's Signature: James Diaz



	Lot 800 (PL-1)		Soil Storage / OWS Building / Hot Spot 4 Area (EO-5)		Water Treatment Trailer (EO-4)		Retention Pond Spare Frag Tank Area (EO-7)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>									
Is the site free of litter and debris?	✓						✓		
Are dumpster lids closed and areas around dumpsters free of trash?			✓						
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓	
<b>Material Storage / Infrastructure</b>									
Are soil storage areas covered and protected from precipitation?	N/A		N/A						NO SOIL STORED AT THIS TIME
Is the area around the soil storage free of material that could mingle with stormwater?	N/A		N/A						NO SOIL STORED AT THIS TIME
Are there building or infrastructure that is rusting or in poor condition?	✓		✓		N/A		✓		TREATMENT TANKS MOVED TO EO-7
<b>Spill Prevention &amp; Response</b>									
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?					SEE NOTE ABOVE IN COMMENTS		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		NO INDICATION OF SPILLS
<b>Other Indicators of Illicit Discharges</b>									
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		
<b>Construction Activities</b>									
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓	✓		✓		AREA COVERED, SILT FENCES IN PLACE (EO-4, EO-7)
<b>Corrective Actions</b>									
Are there items that require follow-up?		✓		✓		✓		✓	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Environmental Operations

Inspection Department: Environmental Operations

Inspection Date & Time: 8/22/24 10:40

Inspector Name: JAMES DUBS

Inspector's Signature: [Signature]



	Building 68 Outside (EO-1)		Building 67 Outside Areas (EO-2)		Material Storage Area (NW of Sub 7) (EO-6)		OW Separator (SE of Bldg 75) (EO-3)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>									
Is the site free of litter and debris?		✓	✓		✓		✓		* E-60 HAS SOME DEBRIS - P/L BY FACILITIES 8/22 (S)
Are dumpster lids closed and areas around dumpsters free of trash?	✓								BUD 68 YARD NEEDS SWEEPING PDEA BLOWN CLEAN BY LEAF BLOWER 8/23 (S)
<b>Material Storage / Infrastructure</b>									
Are containment booms in place and in good condition?					✓		✓		
Are all containers labeled with contents on the appropriate label?									
Are any transformers not stored under cover, leaking, or in poor condition?				✓					
Are there building or infrastructure that is rusting or in poor condition?		✓		✓			✓		
<b>Spill Prevention &amp; Response</b>									
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓						✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		NO INDICATION OF SPILLS
<b>Other Indicators of Illicit Discharges</b>									
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		
<b>Construction Activities</b>									
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓		✓	
<b>Corrective Actions</b>									
Are there items that require follow-up?		✓		✓		✓		✓	SEE NOTES ABOVE - JH



**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Environmental Operations**

Inspection Department: Environmental Operations

Inspection Date & Time: 2/26/24 11:00

Inspector Name: JAMES DUTS

Inspector's Signature: [Signature]



Comments

	Lot 808 (F&A)		Soil Storage / Storm Building / Hot Spill Area (EO-3)		Water Treatment Trailer (EO-4)		Retention Pond / Storm Water Tank Area (EO-7)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>									
Is the site free of litter and debris?	✓		✓		✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?			✓						
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓	
<b>Material Storage / Infrastructure</b>									
Are soil storage areas covered and protected from precipitation?	N/A		N/A						
Is the area around the soil storage free of material that could mingle with stormwater?	N/A		N/A						NO SOL STORED ON SITE AT THIS TIME - JY
Are there building or infrastructure that is rusting or in poor condition?		✓		✓		✓		✓	" "
<b>Spill Prevention &amp; Response</b>									
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?					✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		NO INDICATION OF ANY SPILLS.
<b>Other Indicators of Illicit Discharges</b>									
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		
<b>Construction Activities</b>									
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓		✓	AREA DIRTED AND SILT FENCES REMAIN.
<b>Corrective Actions</b>									
Are there items that require follow-up?		✓		✓		✓		✓	

BUILDING MATERIAL STILL STORED IN AREA - T.I. MOVE TO E-07

NO SOL STORED ON SITE AT THIS TIME - JY

" "

NO INDICATION OF ANY SPILLS.

AREA DIRTED AND SILT FENCES REMAIN.

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Environmental Operations**

Inspection Department: Environmental Operations

Inspection Date & Time: 9/26/24 11:25

Inspector Name: J. D. [Signature]


Inspector's Signature: [Signature]



	Building 60 Generator Area (EQ-1)		Building 60 Oil Storage Areas (EQ-2)		Generator Storage Area (NW of Sub 7) (EQ-6)		Oil Separation Area (SE of Bldg 7) (EQ-3)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>									
Is the site free of litter and debris?	✓				✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?	✓								
<b>Material Storage / Infrastructure</b>									
Are containment booms in place and in good condition?					✓		✓		
Are all containers labeled with contents on the appropriate label?	✓		✓				✓		
Are any transformers not stored under cover, leaking, or in poor condition?				✓					
Are there building or infrastructure that is rusting or in poor condition?		✓		✓		✓		✓	
<b>Spill Prevention &amp; Response</b>									
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓						✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		NO SPILLS INDICATED
<b>Other Indicators of Illicit Discharges</b>									
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		
<b>Construction Activities</b>									
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓		✓	
<b>Corrective Actions</b>									
Are there items that require follow-up?		✓		✓		✓		✓	

**Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Facilities**


Inspection Department: Facilities      Inspection Date & Time: 7/24/24  
 Inspector Name: Eric      Inspector's Signature: [Signature]

	SE Corner Parking Area (FM-1)		South of Sub 7 Parking Area (FM-2)		Credit Union Parking Area (FM-3)		Bldg 44 Parking Area (FM-4)		Central Parking Area (FM-5)		Bldg 59 Parking Areas (FM-7)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>													
Are trash dumpsters closed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Is the site free of litter and debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Illicit Discharges</b>													
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Construction Activities</b>													
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>													
Are there items that require follow-up?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	




**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities      Inspection Date & Time: 7/24/24  
 Inspector Name: Eric      Inspector's Signature: [Signature]

	Front Gate Contractor Yard (FM-8)		South of Sub 45 Contractor Yard Area (FM-10)		Building 36 (FM-9)		Salt Shed (FM-6)		Building 38 Fire Pump House (FM-11)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are trash dumpsters closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Do spill kits contain the proper tools and equipment?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Have all spills been properly cleaned up and disposed of properly in the respective area?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Salt Handling</b>											
Are salt bales in good condition and located at entrance of shed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Corrective Actions</b>											
Are there items that require follow-up?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		


**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities      Inspection Date & Time: 8/29/24  
 Inspector Name: SEFC      Inspector's Signature: [Signature]

	SE Corner Parking Area (FM-1)		South of Sub 7 Parking Area (FM-2)		Credit Union Parking Area (FM-3)		Bldg 44 Parking Area (FM-4)		Central Parking Area (FM-5)		Bldg 59 Parking Areas (FM-7)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>													
Are trash dumpsters closed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Is the site free of litter and debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Illicit Discharges</b>													
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Construction Activities</b>													
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>													
Are there items that require follow-up?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities      Inspection Date & Time: 8/28/24  
 Inspector Name: E. K.      Inspector's Signature: [Signature]

	Front Gate Contractor Yard (FM-8)		South of Sub 45 Contractor Yard Area (FM-10)		Building 36 (FM-9)		Salt Shed (FM-6)		Building 38 Fire Pump House (FM-11)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are trash dumpsters closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Do spill kits contain the proper tools and equipment?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Have all spills been properly cleaned up and disposed of properly in the respective area?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Salt Handling</b>											
Are salt bales in good condition and located at entrance of shed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Corrective Actions</b>											
Are there items that require follow-up?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	




**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities

Inspection Date & Time: 2/26/24

Inspector Name: Eric

Inspector's Signature: [Signature]

	SE Corner Parking Area (FM-1)		South of Sub 7 Parking Area (FM-2)		Credit Union Parking Area (FM-3)		Bldg 44 Parking Area (FM-4)		Central Parking Area (FM-5)		Bldg 59 Parking Areas (FM-7)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are trash dumpsters closed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Is the site free of litter and debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Illicit Discharges</b>													
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Construction Activities</b>													
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>													
Are there items that require follow-up?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Facilities**

Inspection Department: Facilities  
 Inspector Name: ESRC

Inspection Date & Time: 9/26/24  
 Inspector's Signature: [Signature]

PHI	Front Gate Contractor Yard (FM-8)	South of Sub 45 Contractor Yard Area (FM-10)	Building 36 (FM-9)	Salt Shed (FM-6)	Building 38 Fire Pump House (FM-11)	Comments
	Yes	No	Yes	No	Yes	
<b>Good Housekeeping Procedures</b>						
Are outside work areas clean and free of litter and debris?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Are trash dumpsters closed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Spill Prevention &amp; Response</b>						
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Do spill kits contain the proper tools and equipment?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Have all spills been properly cleaned up and disposed of properly in the respective area?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Other Indicators of Illicit Discharges</b>						
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Construction Activities</b>						
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Salt Handling</b>						
Are salt bales in good condition and located at entrance of shed?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>						
Are there items that require follow-up?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	


**Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Fleet**

Inspection Department: Fleet

Inspection Date & Time: 7-30-24 11:00 am

Inspector Name: Michael Law

Inspector's Signature: [Signature]

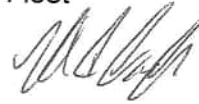
	Fleet Services (Bldg. 75) (FS-1)		Vehicle Wash (Bldg. 32) (FS-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean, and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are trash dumpsters closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are there signs of drainage issue or overflow at any storm drain inlet?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
<b>Materials Handling and Storage</b>					
Are all containers labeled with contents on the appropriate label?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are all containers that are not in use closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are containers stored indoors and away from entrances whenever practical?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>					
Are there items that require follow-up?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	




Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Fleet

Inspection Department: Fleet

7-30-24



	Pump Station (Diesel & Gas) (FS-3)		Comments
	Yes	No	
<b>Spill Prevention &amp; Response</b>			
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		
Is all signage in good, readable condition?	✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		
Any staining from previous spills?		✓	
<b>Mobile Equipment</b>			
Has mobile equipment been inspected for potential leaking fluids?	✓		
Is equipment that is no longer needed removed from the site?	✓		
<b>Construction Activities</b>			
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓	
<b>Corrective Actions</b>			
Are there items that require follow-up?		✓	


**Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Fleet**

Inspection Department: Fleet

Inspection Date & Time: 8-29-24 10:00 am

Inspector Name: Michael Law

Inspector's Signature: [Signature]


	Fleet Services (Bldg. 75) (FS-1)		Vehicle Wash (Bldg. 32) (FS-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean, and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are trash dumpsters closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are there signs of drainage issue or overflow at any storm drain inlet?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
<b>Materials Handling and Storage</b>					
Are all containers labeled with contents on the appropriate label?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are all containers that are not in use closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are containers stored indoors and away from entrances whenever practical?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>					
Are there items that require follow-up?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	

**Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Fleet**

Inspection Department: Fleet

8-29-24

*M. O. H.*

	Pump Station (Diesel & Gas) (FS-3)		Comments
	Yes	No	
<b>Spill Prevention &amp; Response</b>			
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		
Is all signage in good, readable condition?	✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		
Any staining from previous spills?		✓	
<b>Mobile Equipment</b>			
Has mobile equipment been inspected for potential leaking fluids?	✓		
Is equipment that is no longer needed removed from the site?	✓		
<b>Construction Activities</b>			
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓	
<b>Corrective Actions</b>			
Are there items that require follow-up?		✓	




**Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Fleet**

Inspection Department: Fleet

Inspection Date & Time: 9-27-24 11:00 am

Inspector Name: Michael Lowe

Inspector's Signature: [Signature]


	Fleet Services (Bldg. 75) (FS-1)		Vehicle Wash (Bldg. 32) (FS-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean, and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are trash dumpsters closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are there signs of drainage issue or overflow at any storm drain inlet?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
<b>Materials Handling and Storage</b>					
Are all containers labeled with contents on the appropriate label?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are all containers that are not in use closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are containers stored indoors and away from entrances whenever practical?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
<b>Corrective Actions</b>					
Are there items that require follow-up?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	

**Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Fleet**

Inspection Department: Fleet

9-27-24



	Pump Station (Diesel & Gas) (FS-3)		Comments
	Yes	No	
<b>Spill Prevention &amp; Response</b>			
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		
Is all signage in good, readable condition?	✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		
Any staining from previous spills?		✓	
<b>Mobile Equipment</b>			
Has mobile equipment been inspected for potential leaking fluids?	✓		
Is equipment that is no longer needed removed from the site?	✓		
<b>Construction Activities</b>			
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓	
<b>Corrective Actions</b>			
Are there items that require follow-up?		✓	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Stores

Inspection Department: Stores


Inspection Date & Time: 04/24/2024 1:00pm

Inspector Name: Andrew Hart

Inspector's Signature: [Signature]

PHI	Pole Storage Yard, NE Corner (WS-8)		Bldg 35 & 65 Storage Yards (WS-9)		Project Mgmt Storage Yard (WS-10)		Gilligan's Island & West of Bldg 68 (WS-6)		Storage Yard - Adjacent to Bldg 44 and Sub 41 (WS-5)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean, and free of litter and debris?	✓		✓		✓		✓		✓		WS-6 with clean m/1 round of roots to other yard
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
<b>Materials Handling and Storage</b>											
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	✓		✓		✓		✓		✓		No issues
As appropriate are materials stored on pallets?			✓		✓		✓		✓		
Are wire reels in good condition and no material exposure?			✓		✓		✓		✓		lots of cable has been issued this mth
Are all containers labeled with contents on the appropriate label?			✓				✓		✓		Checked OK
Are transformers protected from vehicular traffic?			✓				✓		✓		No issues
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?			✓				✓		✓		1 have been sending out the old wire for the Cooper Shop



	Pole Storage Yard, NE Corner (WS-3)		Bldg 35 & 65 Storage Yards (WS-9)		Project Mgmt Storage Yard (WS-10)		Gilligan's Island & West of Bldg 68 (WS-6)		Storage Yard - Adjacent to Bldg 44 and Sub 41 (WS-5)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		Spill kits - pans are readily available
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		✓		No spills since last report
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		✓		
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓	✓		✓	✓		✓	✓		Bldg 65 Storm project is ongoing Det pile looked good during this inspection
<b>Corrective Actions</b>											
Are there items that require follow-up?		✓		✓		✓		✓		✓	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Stores

Inspection Department: Stores

Inspection Date & Time: July 24, 2024 1:30pm

Inspector Name: Andrew Hart

Inspector's Signature: *Andrew Hart*

PHI	Salvage Yard (WS-7)		Building 88 (WS-4)		Building 66 to Building 42 (WS-2)		Storage Area, North of Building 67 (WS-8)		Storage Yard, South of Sub 7 (WS-1)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean, and free of litter and debris?	✓		✓		✓		✓		✓		Salvage Yard cleaned at night last week
Are trash or recycling dumpsters closed or under cover?			✓		✓		✓		✓		
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		No issues
<b>Materials Handling and Storage</b>											
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	✓		✓		✓		✓		✓		Salvage Yard used red. Pickets here allowed 6.8' bulk space
As appropriate are materials stored on pallets?	✓		✓		✓		✓		✓		
Are wire reels in good condition and no material exposure?									✓		
Are all containers labeled with contents on the appropriate label?									✓		No containers
Are transformers protected from vehicular traffic?									✓		No transformers
Have all transformers been inspected and are they generally in good condition?									✓		No transformer
If transformers are not in good condition (rust or leaking) have they been moved indoors or into containment protected from precipitation?									✓		No transformers

PHI	Salvage Yard (WS-7)		Building 88 (WS-4)		Building 66 to Building 42 (WS-2)		Storage Area, North of Building 67 (WS-8)		Storage Yard, South of Sub 7 (WS-1)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		Spill kits readily available
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		✓		No spills since last inspection
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		✓		checked OK
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓		✓		✓	No current projects
<b>Corrective Actions</b>											
Are there items that require follow-up?		✓		✓		✓		✓		✓	




Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Stores


Inspection Department: Stores

Inspection Date & Time: August 28, 2024 10:00

Inspector Name: Andrew Hart

Inspector's Signature: *Andrew Hart*

	Pole Storage Yard, NE Corner (WS-8)		Bldg 35 & 65 Storage Yards (WS-9)		Project Mgmt Storage Yard (WS-10)		Gilligan's Island & West of Bldg 68 (WS-6)		Storage Yard - Adjacent to Bldg 44 and Sub 41 (WS-5)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean, and free of litter and debris?	/		/		/		/		/		Recent cleanup near drain work area (WS-9)
Are catch basins and other inlets in the area to the storm drain system free from debris?	/		/		/		/		/		Checked OK
Are there signs of drainage issue or overflow at any storm drain inlet?		/		/		/		/		/	
<b>Materials Handling and Storage</b>											
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	/		/		/		/		/		No issues
As appropriate are materials stored on pallets?											
Are wire reels in good condition and no material exposure?											
Are all containers labeled with contents on the appropriate label?											
Are transformers protected from vehicular traffic?											No issues
Have all transformers been inspected and are they generally in good condition?											Checked OK
If transformers are not in good condition (rusty or leaking) have they been moved indoors or into containment protected from precipitation?											No leaking/rusted into 1 damaged

	Pole Storage Yard, NE Corner (WS-8)		Bldg 35 & 65 Storage Yards (WS-9)		Project Mgmt Storage Yard (WS-10)		Gilligan's Island & West of Bldg 68 (WS-6)		Storage Yard - Adjacent to Bldg 44 and Sub 41 (WS-5)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	/		/		/		/		/		kits & pans available
Have all spills been properly cleaned up and disposed of properly in the respective area?	/		/		/		/		/		no spills to report
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	/		/		/		/		/		
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		/	/		/		/		/		Bldg 35/65 drain/Snow project cutlines. Soil area was minimal and tested good.
<b>Corrective Actions</b>											
Are there items that require follow-up?		/		/		/		/		/	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Stores

Inspection Department: Stores

Inspection Date & Time: August 28, 2024 10:30

Inspector Name: Adam Hart

Inspector's Signature: [Signature]

PHI	Salvage Yard (WS-7)		Building 88 (WS-4)		Building 66 to Building 42 (WS-2)		Storage Area, North of Building 67 (WS-8)		Storage Yard, South of Sub 7 (WS-1)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean, and free of litter and debris?	✓		✓		✓		✓		✓		Area looked good
Are trash or recycling dumpsters closed or under cover?			✓		✓		✓		✓		
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		Nothing detailed
<b>Materials Handling and Storage</b>											
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	✓		✓		✓		✓		✓		Same amount of switches near Bldg 42 to get more spacing
As appropriate are materials stored on pallets?	✓		✓		✓		✓		✓		
Are wire reels in good condition and no material exposure?									✓		looked good
Are all containers labeled with contents on the appropriate label?									N/A		No Containers
Are transformers protected from vehicular traffic?									✓		No Transformers
Have all transformers been inspected and are they generally in good condition?									✓		No Transformers
If transformers are not in good condition (rust or leaking) have they been moved indoors or into containment protected from precipitation?									✓		No Transformers



**Spill Prevention & Response**

Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?

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.?

**Construction Activities**

Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?

**Corrective Actions**

Are there items that require follow-up?

Comments

*K.I.T. & Pans Available**\* See below**No projects in these areas*

\* Transfer 500 Gallons of oil from Pallet rack bottom Pallets 60-41 on 8/27. Approximately 10-15 gallons of non-PCB mineral oil was leaked. All oil was contained on the concrete. Cleanup occurred within 2 hours after the spill.


**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Stores**


Inspection Department: Stores

Inspection Date & Time: Sept 25, 2024 9:00

Inspector Name: Andrew Alart

Inspector's Signature: [Signature]

	Pole Storage Yard, NE Corner (WS-8)		Bldg 35 & 65 Storage Yards (WS-9)		Project Mgmt Storage Yard (WS-10)		Gilligan's Island & West of Bldg 68 (WS-6)		Storage Yard - Adjacent to Bldg 44 and Sub 41 (WS-5)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean, and free of litter and debris?	✓		✓		✓		✓		✓		Area 35 & 65 pick has been fixed
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		No issues found
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
<b>Materials Handling and Storage</b>											
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	✓		✓		✓		✓		✓		Check OK
As appropriate are materials stored on pallets?			✓		✓		✓		✓		
Are wire reels in good condition and no material exposure?			✓		✓		✓		✓		
Are all containers labeled with contents on the appropriate label?			✓		✓		✓		✓		Check OK
Are transformers protected from vehicular traffic?			✓		✓		✓		✓		
Have all transformers been inspected and are they generally in good condition?			✓		✓		✓		✓		No issues found
If transformers are not in good condition (rusted or leaking) have they been moved indoors or into containment protected from precipitation?			✓		✓		✓		✓		No issues found

	Pole Storage Yard, NE Corner (WS-8)		Bldg 35 & 65 Storage Yards (WS-9)		Project Mgmt Storage Yard (WS-10)		Gilligan's Island & West of Bldg 68 (WS-6)		Storage Yard - Adjacent to Bldg 44 and Sub 41 (WS-5)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Spill Prevention &amp; Response</b>											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		lots - pane located in areas
Have all spills been properly cleaned up and disposed of properly in the respective area?	—		—		—		—		—		No Spills in these areas
<b>Other Indicators of Illicit Discharges</b>											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		✓		
<b>Construction Activities</b>											
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓	✓			✓		✓		✓	Bldg 35/65 project almost done. No soil this month.
<b>Corrective Actions</b>											
Are there items that require follow-up?		✓		✓		✓		✓		✓	



**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Stores**

Inspection Department: Stores      Inspection Date & Time: Sept 25, 2024 9:30  
 Inspector Name: Andrew Blat      Inspector's Signature: [Signature]

PHI	Salvage Yard (WS-7)		Building 88 (WS-4)		Building 66 to Building 42 (WS-2)		Storage Area, North of Building 67 (WS-8)		Storage Yard, South of Sub 7 (WS-1)		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>											
Are outside work areas clean, and free of litter and debris?	✓		✓		✓		✓		✓		
Are trash or recycling dumpsters closed or under cover?			✓		✓		N/A		N/A		131kg 88 Force line picked up last week
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
<b>Materials Handling and Storage</b>											
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	✓		✓		✓		✓		✓		
As appropriate are materials stored on pallets?	✓		✓		✓		✓		✓		
Are wire reels in good condition and no material exposure?									✓		No issues
Are all containers labeled with contents on the appropriate label?									✓		No happens in that area
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.)?

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.?

**Construction Activities**

Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?

**Corrective Actions**

Are there items that require follow-up?

Comments

Spill kit & pans available

No Spills

No active projects

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Transmission & Substations**

Inspection Department: Transmission & Substations

Inspection Date & Time: 7-31-24 / 11:00

Inspector Name: C. Tyler

Inspector's Signature: \_\_\_\_\_



	Mineral Oil Storage (Bldg. 57) (SS-4)		Tanker/ASTs		Building 29 ASTs & Oil Filtration (SS-5)		Comments
	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>							
Are containment areas in good condition, with valves closed?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are dumpster lids closed and areas around dumpsters free of trash?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	NO dumpster in area
Are there building or infrastructure that is rusting or in poor condition?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
Are work areas clean and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Materials Handling and Storage</b>							
Are all containers labeled with contents on the appropriate label?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are all containers closed when not in use?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are containers protected from precipitation and runoff whenever practical?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are containers protected from vehicular traffic?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Is secondary containment available for containers?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Spill Prevention &amp; Response</b>							
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Have all spills been properly cleaned up and disposed of properly in the respective area?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		





	Mineral Oil Storage (Bldg. 57) (SS-4)		Tanker/ASTs		Building 29 ASTs & Oil Filtration (SS-X)		Comments
	Yes	No	Yes	No	Yes	No	
<b>Mobile Equipment</b>							
Has mobile equipment been inspected for potential leaking fluids?			✓				
Is equipment that is no longer needed removed from the site?			✓				
<b>Other Indicators of Illicit Discharges</b>							
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		
<b>Construction Activities</b>							
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	✓		✓		✓		
<b>Corrective Actions</b>							
Are there items that require follow-up?		✓		✓		✓	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Transmission & Substations

Inspection Department: Transmission & Substations

Inspection Date & Time: 7-31-24 / 1100

Inspector: C. Tyler

Inspector's Signature: C. Tyler



	Substation 7 (SS-3)		Substation 41 (SS-2)		Substation 45 (SS-1)		Comments
	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>							
Are containment areas in good condition, with valves closed?	✓		✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?		✓		✓		✓	No dumpster in area
Are there building or infrastructure that is rusting or in poor condition?		✓		✓		✓	
Are work areas clean and free of litter and debris?	✓		✓		✓		
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓	
<b>Spill Prevention &amp; Response</b>							
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		
<b>Other Indicators of Illicit Discharges</b>							
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		
<b>Construction Activities</b>							
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓	
<b>Corrective Actions</b>							
Are there items that require follow-up?		✓		✓		✓	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Transmission & Substations

Inspection Department: Transmission & Substations

Inspection Date & Time: 7-31-24/1100

Inspector: C. Tyler

Inspector's Signature: C. Tyler



	Spare Transformer Staging - West of Salvage Yard (SS-6)		Spare Transformer Staging - Foote Street (SS-7)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are containment areas in good condition, with valves closed?	✓		✓		
Are there building or infrastructure that is rusting or in poor condition?		✓		✓	
Are work areas clean and free of litter and debris?	✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓	
<b>Spill Prevention &amp; Response</b>					
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓	
<b>Corrective Actions</b>					
Are there items that require follow-up?		✓		✓	



**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Transmission & Substations**

Inspection Department: Transmission & Substations

Inspection Date & Time: 8-30-24/2000

Inspector Name: C. Tyler

Inspector's Signature: C. Tyler



	Mineral Oil Storage (Bldg. 57) (SS-4)		Tanker/ASTs		Building 29 ASTs & Oil Filtration (SS-5)		Comments
	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>							
Are containment areas in good condition, with valves closed?							
Are dumpster lids closed and areas around dumpsters free of trash?	✓		✓		✓		
Are there building or infrastructure that is rusting or in poor condition?							No dumpsters in area
Are work areas clean and free of litter and debris?	✓		✓		✓		
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		
<b>Materials Handling and Storage</b>							
Are all containers labeled with contents on the appropriate label?	✓		✓		✓		
Are all containers closed when not in use?	✓		✓		✓		
Are containers protected from precipitation and runoff whenever practical?	✓		✓		✓		
Are containers protected from vehicular traffic?	✓		✓		✓		
Is secondary containment available for containers?	✓		✓		✓		
<b>Spill Prevention &amp; Response</b>							
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		



	Mineral Oil Storage (Bldg. 57) (SS-4)		Tanker/ASTs		Building 29 ASTs & Oil Filtration (SS-X)		Comments
	Yes	No	Yes	No	Yes	No	
<b>Mobile Equipment</b>							
Has mobile equipment been inspected for potential leaking fluids?							
Is equipment that is no longer needed removed from the site?			✓			✓	
<b>Other Indicators of Illicit Discharges</b>			✓		✓		
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?							
<b>Construction Activities</b>			✓		✓		
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?	✓		✓			✓	
<b>Corrective Actions</b>							
Are there items that require follow-up?		✓		✓			

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Transmission & Substations**

Inspection Department: Transmission & Substations

Inspection Date & Time: 8-30-24/0900

Inspector: C. Taylor

Inspector's Signature: C. Taylor



	Substation 7 (SS-3)		Substation 41 (SS-2)		Substation 45 (SS-1)		Comments
	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>							
Are containment areas in good condition, with valves closed?	✓		✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?		✓		✓		✓	NO dumpster in area
Are there building or infrastructure that is rusting or in poor condition?	✓			✓		✓	
Are work areas clean and free of litter and debris?	✓		✓		✓		
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓	
<b>Spill Prevention &amp; Response</b>							
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		
<b>Other Indicators of Illicit Discharges</b>							
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		
<b>Construction Activities</b>							
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓	
<b>Corrective Actions</b>							
Are there items that require follow-up?		✓		✓		✓	



**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Transmission & Substations**

Inspection Department: Transmission & Substations

Inspection Date & Time: 8-30-24 0900

Inspector: C. Tyler

Inspector's Signature: C. Tyler



	Spare Transformer Staging - West of Salvage Yard (SS-6)		Spare Transformer Staging - Foote Street (SS-7)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are containment areas in good condition, with valves closed?					
Are there building or infrastructure that is rusting or in poor condition?	✓		✓		
Are work areas clean and free of litter and debris?	✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓	
<b>Spill Prevention &amp; Response</b>					
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓	
<b>Corrective Actions</b>					
Are there items that require follow-up?		✓		✓	

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Transmission & Substations**

Inspection Department: Transmission & Substations

Inspection Date & Time: 9-27-24/10500

Inspector Name: C. Tyler

Inspector's Signature: C. Tyler



	Mineral Oil Storage (Bldg. 57) (SS-4)		Tanker/ASTs		Building 29 ASTs & Oil Filtration (SS-5)		Comments
	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>							
Are containment areas in good condition, with valves closed?	✓		✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?					✓		No dumpster in area
Are there building or infrastructure that is rusting or in poor condition?		✓		✓		✓	
Are work areas clean and free of litter and debris?	✓		✓		✓		
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		
<b>Materials Handling and Storage</b>							
Are all containers labeled with contents on the appropriate label?	✓		✓		✓		
Are all containers closed when not in use?	✓		✓		✓		
Are containers protected from precipitation and runoff whenever practical?	✓		✓		✓		
Are containers protected from vehicular traffic?	✓		✓		✓		
Is secondary containment available for containers?	✓		✓		✓		
<b>Spill Prevention &amp; Response</b>							
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		



Mobile Equipment	Mineral Oil Storage (Bldg. 57) (SS-4)		Tanker/ASTs		Building 29 ASTs & Oil Filtration (SS-X)		Comments
	Yes	No	Yes	No	Yes	No	
Has mobile equipment been inspected for potential leaking fluids?							
Is equipment that is no longer needed removed from the site?							
Other Indicators of Illicit Discharges							
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?							
Construction Activities							
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?							
Corrective Actions							
Are there items that require follow-up?							



**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Transmission & Substations**

Inspection Department: Transmission & Substations

Inspection Date & Time: 9-27-24/0800

Inspector: C. Miller

Inspector's Signature: C. Miller



	Substation 7 (SS-3)		Substation 41 (SS-2)		Substation 45 (SS-1)		Comments
	Yes	No	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>							
Are containment areas in good condition, with valves closed?	✓		✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?		✓		✓		✓	NO dumpster in area
Are there building or infrastructure that is rusting or in poor condition?		✓		✓		✓	
Are work areas clean and free of litter and debris?	✓		✓		✓		
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓	
<b>Spill Prevention &amp; Response</b>							
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		
<b>Other Indicators of Illicit Discharges</b>							
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		
<b>Construction Activities</b>							
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓		✓	
<b>Corrective Actions</b>							
Are there items that require follow-up?	✓		✓		✓		

**Pepco - Benning Road Facility**  
**Site Wide Monthly Inspection Form - Transmission & Substations**

Inspection Department: Transmission & Substations

Inspection Date & Time: 9-27-24/10800

Inspector: C. Tyler

Inspector's Signature: C. Tyler



Good Housekeeping Procedures	Spare Transformer Staging - West of Salvage Yard (SS-6)		Spare Transformer Staging - Foote Street (SS-7)		Comments
	Yes	No	Yes	No	
Are containment areas in good condition, with valves closed?	✓		✓		
Are there building or infrastructure that is rusting or in poor condition?		✓			
Are work areas clean and free of litter and debris?	✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓	
<b>Spill Prevention &amp; Response</b>					
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓	
<b>Corrective Actions</b>					
Are there items that require follow-up?		✓		✓	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Transformer Shop

Inspection Department Transformer Shop

Inspection Date & Time 7.2.24

Inspector Name COREY HARRIS

Inspector's Signature Cory Harris



	Buildings 56 and 54 (TS-1)		Transformer Lay Down Area (TS-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean, and free of litter and debris?	✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?	✓		✓		
Are there building or infrastructure that is rusting or in poor condition?		✓		✓	
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		
<b>Materials Handling and Storage</b>					
Are scrap metal bins free of rust?	✓		✓		
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	✓		✓		
Are all containers labeled with contents on the appropriate label?	✓		✓		
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 (rusting or leaking) have they been moved indoors or into containment protected from precipitation?	✓		✓		





	Buildings 56 and 54 (TS-1)		Transformer Lay Down Area (TS-2)		Comments
	Yes	No	Yes	No	
<b>Spill Prevention &amp; Response</b>					
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓	
<b>Corrective Actions</b>					
Are there items that require follow-up?		✓		✓	

**Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Transformer Shop**

Inspection Department: Transformer Shop

Inspection Date & Time: 8-30-24

Inspector Name: Donte Taylor

Inspector's Signature: Donte Taylor



	Buildings 56 and 54 (TS-1)		Transformer Lay Down Area (TS-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean, and free of litter and debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are dumpster lids closed and areas around dumpsters free of trash?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are there building or infrastructure that is rusting or in poor condition?		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
Are catch basins and other inlets in the area to the storm drain system free from debris?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>Materials Handling and Storage</b>					
Are scrap metal bins free of rust?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are all containers labeled with contents on the appropriate label?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Are transformers protected from vehicular traffic?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Have all transformers been inspected and are they generally in good condition?			<input checked="" type="checkbox"/>		
If transformers are not in good condition (rusting or leaking) have they been moved indoors or into containment protected from precipitation?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		



	Buildings 56 and 54 (TS-1)		Transformer Lay Down Area (TS-2)		Comments
	Yes	No	Yes	No	
<b>Spill Prevention &amp; Response</b>					
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓	
<b>Corrective Actions</b>					
Are there items that require follow-up?		✓		✓	



**Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Transformer Shop**

Inspection Department: Transformer Shop

Inspection Date & Time: 9-3-24

Inspector Name: Dalano Toney

Inspector's Signature: [Signature]



	Buildings 56 and 54 (TS-1)		Transformer Lay Down Area (TS-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean, and free of litter and debris?	✓		✓		
Are dumpster lids closed and areas around dumpsters free of trash?	✓		✓		
Are there building or infrastructure that is rusting or in poor condition?		✓		✓	
Are catch basins and other inlets in the area to the storm drain system free from debris?	✓		✓		
<b>Materials Handling and Storage</b>					
Are scrap metal bins free of rust?	✓		✓		
Is there adequate aisle space and organization in all storage areas so that any corrosion or leaks can be detected early?	✓		✓		
Are all containers labeled with contents on the appropriate label?	✓		✓		
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 (rusting or leaking) have they been moved indoors or into containment protected from precipitation?	✓		✓		




	Buildings 56 and 54 (TS-1)		Transformer Lay Down Area (TS-2)		Comments
	Yes	No	Yes	No	
<b>Spill Prevention &amp; Response</b>					
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		✓		✓	
<b>Corrective Actions</b>					
Are there items that require follow-up?		✓		✓	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Underground

Inspection Department: Underground

Inspection Date & Time: 07 / 17 / 2024

Inspector Name: Nathan True

Inspector's Signature: 



	Outside of Building 32 (UG-1)		Storage Area North of Bldg 65 (UG-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean and free of litter and debris?	X		X		Reel of Jacketed Primary Cable close to fence behind Bldg 32.
Are there building or infrastructure that is rusting or in poor condition?	X			X	BLDG 32, Door frames rusting and need to be painted, the issue has been noted and is in planning to be addressed
Are dumpster lids closed and areas around dumpsters free of trash?	X		X		Orange Dumpster behind Bldg 32, been repositioned. Needs to be removed
Are catch basins and other inlets in the area to the storm drain system free from debris?	X		X		
Are there signs of drainage issues or overflow at any storm drain inlet?		X		X	
<b>Materials Handling and Storage</b>					
Are materials stored outside covered?	X		X		
Are all outside containers labeled with contents on the appropriate label?	X		X		
<b>Spill Prevention &amp; Response</b>					
Have all spills been properly cleaned up and disposed of properly in the respective area?	X		X		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	X		X		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		X		X	NO CURRENT PROJECTS OR ISSUES
<b>Corrective Actions</b>					
Are there items that require follow-up?		X		X	




Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Underground

Inspection Department: Underground

Inspection Date & Time: 08 / 21 / 2024

Inspector Name: Nathan True

Inspector's Signature: 



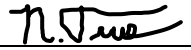
	Outside of Building 32 (UG-1)		Storage Area North of Bldg 65 (UG-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean and free of litter and debris?	X		X		Reel of Jacketed Primary Cable close to fence behind Bldg 32, belongs to training..
Are there building or infrastructure that is rusting or in poor condition?	X			X	BLDG 32, Door frames rusting and need to be painted, the issue has been noted and is in planning to be addressed
Are dumpster lids closed and areas around dumpsters free of trash?	X		X		
Are catch basins and other inlets in the area to the storm drain system free from debris?	X		X		
Are there signs of drainage issues or overflow at any storm drain inlet?		X		X	
<b>Materials Handling and Storage</b>					
Are materials stored outside covered?	X		X		
Are all outside containers labeled with contents on the appropriate label?	X		X		
<b>Spill Prevention &amp; Response</b>					
Have all spills been properly cleaned up and disposed of properly in the respective area?	X		X		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	X		X		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		X		X	NO CURRENT PROJECTS OR ISSUES
<b>Corrective Actions</b>					
Are there items that require follow-up?		X		X	

Pepco - Benning Road Facility  
Site Wide Monthly Inspection Form - Underground

Inspection Department: Underground

Inspection Date & Time: 09 / 24 / 2024

Inspector Name: Nathan True

Inspector's Signature: 



	Outside of Building 32 (UG-1)		Storage Area North of Bldg 65 (UG-2)		Comments
	Yes	No	Yes	No	
<b>Good Housekeeping Procedures</b>					
Are outside work areas clean and free of litter and debris?	X		X		Reel of Jacketed Primary Cable close to fence behind Bldg 32, belongs to training..
Are there building or infrastructure that is rusting or in poor condition?	X			X	BLDG 32, Door frames rusting and need to be painted, the issue has been noted and is in planning to be addressed
Are dumpster lids closed and areas around dumpsters free of trash?	X		X		
Are catch basins and other inlets in the area to the storm drain system free from debris?	X		X		
Are there signs of drainage issues or overflow at any storm drain inlet?		X		X	
<b>Materials Handling and Storage</b>					
Are materials stored outside covered?	X		X		
Are all outside containers labeled with contents on the appropriate label?	X		X		
<b>Spill Prevention &amp; Response</b>					
Have all spills been properly cleaned up and disposed of properly in the respective area?	X		X		
<b>Other Indicators of Illicit Discharges</b>					
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	X		X		
<b>Construction Activities</b>					
Are there any active construction projects? If yes, are storm drains protected, material covered, no erosion or sediment observed?		X		X	NO CURRENT PROJECTS OR ISSUES
<b>Corrective Actions</b>					
Are there items that require follow-up?		X		X	

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

Status of Stormwater Treatment System

Outfall 013

Performance Testing

- As detailed in the Spring 2024 performance testing submitted to EPA on October 1, 2024. PEPCO performed the following next steps:
  - Our performance testing contractor completed the sampling for the Spring 2024 performance testing on May 15<sup>th</sup>, 2024.
  - Pepco continued coordination with our Stormwater Treatment System O&M contractor in the 3<sup>rd</sup> quarter 2024 to discuss maintenance of the Jellyfish and Stormfilter units that did not meet their performance criteria during the Spring 2024 performance testing. A report regarding the cleaning of treatment units in October 2024 and the replacement of Stormfilter cartridges, and the outcome of discussions with the O&M contractor will be provided in the fourth quarter, 2024 NPDES Consent Order report.
  - Pepco met with our performance testing contractor in September 2024 to discuss the upcoming performance testing, locations where effluent concentrations are greater than influent conditions, and location or sampling changes needed for improving stormwater collection for the StormFilter effluent bays. Pepco will report out in the Fall 2024 performance testing report the results of these initiatives.

Maintenance

- Quarterly maintenance was completed over the week of July 8<sup>th</sup>, 2024. Our O&M contractor cleaned all the Jellyfish cartridges during the 3<sup>rd</sup> quarter maintenance.

Outfall 101

The Outfall 101 stormwater treatment system was fully operational as of the 2<sup>nd</sup> quarter, 2022. Results from the most recent quarterly sampling events show the system continues to effectively treat the stormwater to below the Outfall 101 permit limits. A summary of the results is presented below:



	Limit (starting 6/1/2022)										Benchmarks				
	PH	TSS	O&G	Iron	Copper	Zinc	Lead	PCB1242*	PCB1254*	PCB1260*	Nickel	Cadmium	TN	TP	Sample
		mg/l	mg/l	ug/l	ug	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	mg/l	mg/l	Date
Max Daily Limits	6 - 8.5	100	10	9,643	67.4	622.7	994.2	0	0	0	4,515	17.3	---	---	
3Q 2024	6.92	5.1	0	120	6	11	1.6				1.4	0	0.33	0.1	8/8/2024
2Q 2024	7.89	10	0	340	16	25	7.3				8.8	0	<1.78	0	5/4/2024
1Q 2024	7.11	<3.0	0	180	6.1	39	1.5	0	0	0	3.0	<0.50	<0.61	<0.10	3/23/2024
4Q 2023	8.35	3.5	<5.4	230	7.1	<10	1.7				2.2	0	1.36	0.15	10/14/2023
3Q 2023	8.46	<3.0	<5.4	100	6.8	<10	1.1				<1.0	0	1.93	0.48	9/23/2023
2Q 2023	6.69	16	0	620	14	51	12				6.0	<0.50	<1.1	0.11	4/22/2023
1Q 2023	7.73	5.1	0	910	6.3	16	5	0	0	0	5.9	0	< 1.24	<0.1	1/13/2023
4Q 2022	7.6	13	<5.2	140	4.5	12	0.87				3.0	0	0.19	0	11/11/2022
3Q 2022	8.4	5.2	<4.7	140	<5.0	30	2.1				<5.0	<0.50	<1.1	<0.1	7/25/2022
2Q 2022	7.77	4	<1.5	410	2.8	48	1.2				2.4	1	<1.1	<0.1	5/27/2022
1Q 2022	8.43	47	<1.5	650	22	48	3.9	0	0	0	11	<0.5	2.1	<0.05	3/9/2022
4Q 2021	7.32	170	<1.5	2,800	55	110	32	0	0	0	37	<0.5	3.16	0.26	10/25/2021
3Q 2021	8.08	92.0	<5.0	1,350	23.2	274	16.8	<0.476 <sup>1</sup>	<0.476 <sup>1</sup>	<0.476 <sup>1</sup>	6.38	<0.6	<2.031	0.23	8/27/2021

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 July - September 2024.

Name_Last, First	Department	VP_NAME	Component Title	Date-Completion	ORG_DESC
Anderson, Matthew	UG Maint & Construct	Jaclyn R Cantler	SWP3	Wednesday, September 18, 2024	PEP UG Maint & Construct
Armel, James	Fleet	Bruce Davis	SWP3	Thursday, September 19, 2024	PEP Pepco Fleet
Baylor, Garius	UG Maint & Construct	Jaclyn R Cantler	SWP3	Tuesday, September 10, 2024	PEP UG Maint & Construct
Bridgell-Mills, Shattera	Engineering	Jaclyn R Cantler	SWP3	Friday, July 12, 2024	PEP Pepco Engineering
Brooks, Charles	Work Management	Jaclyn R Cantler	SWP3	Tuesday, September 24, 2024	PEP Pepco Work Management
Burnell, Corshay	Engineering	Jaclyn R Cantler	SWP3	Thursday, September 26, 2024	PEP Pepco Engineering
Byers, Vijon	Field Training -	Bruce Davis	SWP3	Monday, August 12, 2024	PEP Field Training - Pepco
Campbell, Donna	Engineering	Jaclyn R Cantler	SWP3	Tuesday, August 6, 2024	PEP Pepco Engineering
Carino, Noel	Engineering	Jaclyn R Cantler	SWP3	Friday, September 27, 2024	PEP Pepco Engineering
Clabaugh, Mark	TUG Construction & Maint	Samuel F Williams	SWP3	Friday, August 23, 2024	PEP Pepco TUG Construction & Maint
Coats, Loni	Regional Business	Jaclyn R Cantler	SWP3	Friday, July 5, 2024	PEP Pepco Regional Business
Colby, Chelsea	Engineering	Awais Bin Saeed	SWP3	Tuesday, September 10, 2024	PEP Pepco Engineering
Cook, James	UG Maint & Construct	Jaclyn R Cantler	SWP3	Thursday, September 26, 2024	PEP UG Maint & Construct
Cooke, Bradley	UG Maint & Construct	Jaclyn R Cantler	SWP3	Tuesday, September 17, 2024	PEP UG Maint & Construct
Culver, Harrison	UG Maint & Construct	Jaclyn R Cantler	SWP3	Monday, July 22, 2024	PEP UG Maint & Construct
Cureton, Kwame	UG Maint & Construct	Jaclyn R Cantler	SWP3	Tuesday, July 2, 2024	PEP UG Maint & Construct
Davis, Richard	UG Maint & Construct	Jaclyn R Cantler	SWP3	Thursday, September 19, 2024	PEP UG Maint & Construct
Dietrich, Justin	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Monday, August 12, 2024	PEP Transformer Shop Dist
Dixon Jr, Ronnie	Engineering	Jaclyn R Cantler	SWP3	Thursday, July 11, 2024	PEP Pepco Engineering
Duperly, Heather	Engineering	Jaclyn R Cantler	SWP3	Friday, September 13, 2024	PEP Pepco Engineering
Edelen Jr, Charles	UG Maint & Construct	Jaclyn R Cantler	SWP3	Monday, July 1, 2024	PEP UG Maint & Construct
Foster, Keith	UG Maint & Construct	Jaclyn R Cantler	SWP3	Thursday, August 15, 2024	PEP UG Maint & Construct
Fox, Omari	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Monday, July 22, 2024	PEP Transformer Shop Dist
Gilchrist, John	Facility Mgmt	Awais Bin Saeed	SWP3	Monday, September 9, 2024	PEP PEPCO-REF Facility Mgmt
Gormley, Ryan	UG Maint & Construct	Jaclyn R Cantler	SWP3	Wednesday, July 10, 2024	PEP UG Maint & Construct
Gutierrez, Pedro	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Friday, August 9, 2024	PEP Transformer Shop Dist
Hadley, Veron	Regional Business	Jaclyn R Cantler	SWP3	Thursday, August 1, 2024	PEP Pepco Regional Business
Hairston, Teri	TUG Construction & Maint	Samuel F Williams	SWP3	Tuesday, August 27, 2024	PEP Pepco TUG Construction & Maint
Harris, Corey	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Thursday, July 18, 2024	PEP Transformer Shop Dist
Hinton, Jason	UG Maint & Construct	Jaclyn R Cantler	SWP3	Monday, August 19, 2024	PEP UG Maint & Construct
Holliday, Devin	UG Maint & Construct	Jaclyn R Cantler	SWP3	Friday, August 9, 2024	PEP UG Maint & Construct
Holt, Jason	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Friday, August 23, 2024	PEP Transformer Shop Dist
Johnson, Jonathan	UG Maint & Construct	Jaclyn R Cantler	SWP3	Wednesday, September 25, 2024	PEP UG Maint & Construct
Kargbo, Abdulai	Relay	Samuel F Williams	SWP3	Wednesday, September 25, 2024	PEP Relay
Kerns, William	UG Maint & Construct	Jaclyn R Cantler	SWP3	Thursday, September 19, 2024	PEP UG Maint & Construct
Ko, Cheiho	Engineering	Jaclyn R Cantler	SWP3	Friday, August 9, 2024	PEP Pepco Engineering
Krahling, Nicholas	Telecommunications	Samuel F Williams	SWP3	Tuesday, September 24, 2024	PEP Telecommunications
Lipscomb-White, Theodenna	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Tuesday, September 10, 2024	PEP Transformer Shop Dist
Maxwell, Richard	UG Maint & Construct	Jaclyn R Cantler	SWP3	Wednesday, July 24, 2024	PEP UG Maint & Construct
Mccrary, Portia	Regional Business	Jaclyn R Cantler	SWP3	Tuesday, August 27, 2024	PEP Pepco Regional Business
McLaurin, Timothy	Engineering	Jaclyn R Cantler	SWP3	Tuesday, July 2, 2024	PEP Pepco Engineering
Meetre Jr, James	UG Maint & Construct	Jaclyn R Cantler	SWP3	Wednesday, July 24, 2024	PEP UG Maint & Construct
Mitchell Jr, William	UG Maint & Construct	Jaclyn R Cantler	SWP3	Monday, August 19, 2024	PEP UG Maint & Construct
Ng, Michael	Engineering	Jaclyn R Cantler	SWP3	Wednesday, August 28, 2024	PEP Pepco Engineering
Nguyen, David	Engineering	Jaclyn R Cantler	SWP3	Wednesday, September 18, 2024	PEP Pepco Engineering
Nowlin, Jemayne	UG Maint & Construct	Jaclyn R Cantler	SWP3	Monday, September 23, 2024	PEP UG Maint & Construct
Peddicoz, Corey	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Tuesday, July 23, 2024	PEP Transformer Shop Dist
Person, Rayshon	Regional Business	Jaclyn R Cantler	SWP3	Friday, August 2, 2024	PEP Pepco Regional Business
Poe, Brian	UG Maint & Construct	Jaclyn R Cantler	SWP3	Friday, September 20, 2024	PEP UG Maint & Construct
Powell, Danielle	TUG Construction & Maint	Samuel F Williams	SWP3	Wednesday, September 11, 2024	PEP Pepco TUG Construction & Maint
Ray, Dorian	UG Maint & Construct	Jaclyn R Cantler	SWP3	Friday, August 2, 2024	PEP UG Maint & Construct
Ricci Jr, Gino	Work Management	Jaclyn R Cantler	SWP3	Tuesday, July 23, 2024	PEP Pepco Work Management
Richardson, Valdis	UG Maint & Construct	Jaclyn R Cantler	SWP3	Wednesday, September 25, 2024	PEP UG Maint & Construct
Ryan, Julian	UG Maint & Construct	Jaclyn R Cantler	SWP3	Tuesday, August 20, 2024	PEP UG Maint & Construct
Samuel, Ollie	UG Maint & Construct	Jaclyn R Cantler	SWP3	Tuesday, July 2, 2024	PEP UG Maint & Construct
Shaw, Malea	Engineering	Jaclyn R Cantler	SWP3	Monday, July 15, 2024	PEP Pepco Engineering
Siewe Kwegue, Janel Martial	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Monday, September 23, 2024	PEP Transformer Shop Dist
Starke, Maurice	UG Maint & Construct	Jaclyn R Cantler	SWP3	Thursday, September 12, 2024	PEP UG Maint & Construct
Sulaiman, Mia	Engineering	Jaclyn R Cantler	SWP3	Monday, September 16, 2024	PEP Pepco Engineering
Thomas Jr., Marcellus	UG Maint & Construct	Jaclyn R Cantler	SWP3	Wednesday, July 24, 2024	PEP UG Maint & Construct
Toney, Dalano	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Monday, September 30, 2024	PEP Transformer Shop Dist
Turner, Matthew	Engineering	Jaclyn R Cantler	SWP3	Friday, September 27, 2024	PEP Pepco Engineering
Vance, Roger	Transformer Shop Dist	Jaclyn R Cantler	SWP3	Friday, July 26, 2024	PEP Transformer Shop Dist
Walker, Ashley	UG Maint & Construct	Jaclyn R Cantler	SWP3	Tuesday, September 3, 2024	PEP UG Maint & Construct
Welch, Jason	Engineering	Jaclyn R Cantler	SWP3	Thursday, July 18, 2024	PEP Pepco Engineering
Wells, Richard	UG Maint & Construct	Jaclyn R Cantler	SWP3	Friday, August 30, 2024	PEP UG Maint & Construct
Wells, Travis	UG Maint & Construct	Jaclyn R Cantler	SWP3	Monday, July 8, 2024	PEP UG Maint & Construct
Williams, Malcolm	UG Maint & Construct	Jaclyn R Cantler	SWP3	Thursday, September 5, 2024	PEP UG Maint & Construct
Winebrener, Douglas E	UG Maint & Construct	Jaclyn R Cantler	SWP3	Tuesday, September 24, 2024	PEP UG Maint & Construct



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

Stormwater Pollution Prevention Plan

The Stormwater Pollution Prevention Plan (SWPPP) annual review was completed by the SWPPP team in 2024 and the SWPPPs were updated following that review. Because a portion of the property was sold to a third party in 2023 for redevelopment, two separate SWPPPs have been prepared. One SWPPP covers the portion of the property that was sold (but that remains subject to the facility's NPDES permit), referred to as Benning Service Center – West. A separate SWPPP covers the property retained by Pepco, referred to as Benning Service Center -- East. Copies of the two updated SWPPPS are attached to this report.

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# **Stormwater Pollution Prevention and Best Management Practices Plan**

**for:**

Pepco Benning Service Center - East  
3400 Benning Road NE  
Washington, D.C. 20019

## **SWPPP/BMP Contact(s):**

Pepco Holdings, Inc.  
Ghirmay Berhe  
3400 Benning Road NE  
Washington, DC 20019  
ghirmay.behre@exeloncorp.com

## **Plan Date:**

July 2024

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## ACRONYMS

AST	Aboveground Storage Tank
BMP	Best Management Practice
BOD	Biochemical Oxygen Demand
BSC	Benning Service Center
CCTV	Closed Circuit Television
CFR	Code of Federal Regulations
DC	District of Columbia
DDD	Dichlorodiphenyldichloroethane
DDE	Dichlorodiphenyldichloroethylene
DDT	Dichlorodiphenyltrichloroethane
DOEE	Department of Energy and the Environment
E. coli	Escherichia Coli
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
HPFF	High-Pressure Fluid-Filled
HSEMA	Homeland Security & Emergency Management Agency
HWCP	Hazardous Waste Contingency Plan
MS4	Municipal Separate Storm Sewer System
NAD	the North American Datum
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
OWS	Oil/Water Separator
PAH	Polycyclic Aromatic Hydrocarbons
PCB	Polychlorinated Biphenyl
Pepco	the Potomac Electric Power Company
RCRA	Resource Conservation and Recovery Act
SPCC	Spill Prevention, Control, And Countermeasures
SWPPP	Stormwater Pollutant Prevention Plan
T&D	Transmission and Distribution
TMDL	Total Maximum Daily Load
TSCA	Toxic Substance Control Act
TSS	Total Suspended Solids
USGS	United States Geological Survey



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## SECTION 1: INTRODUCTION

The Potomac Electric Power Company (Pepco), a subsidiary of Exelon, operates the Benning Service Center – East (BSC-East, or “the Facility”). The Facility supports Pepco’s electric transmission and distribution system within the District of Columbia, Virginia, and Maryland. Located in northeast District of Columbia, BSC houses a variety of operations and maintenance functions. The Facility discharges stormwater to the nearby Anacostia River under a National Pollutant Discharge Elimination System (NPDES) permit (No. DC0000094) issued by the U.S. Environmental Protection Agency (EPA).

### 1.1 Plan Purpose

In compliance with the provisions of the Clean Water Act, 33 U.S.C. §§ 1251 *et seq.*, as amended by the Water Quality Act of 1987, P.L. 100-4, Pepco is authorized to discharge from BSC to Anacostia River in accordance with discharge points, effluent limitation, monitoring requirements and other conditions set forth in the NPDES permit (No. DC0000094), which reissued in 2021. The reissued permit took effect on June 1, 2021, was subsequently modified on May 15, 2022 and expires on May 31, 2026. A copy of the May 15, 2022 NPDES Permit can be found in **Attachment A**.

As required by Section F in Special Conditions of the NPDES permit, a Stormwater Pollution Prevention Plan (SWPPP) shall be updated and signed by the permittee within 90 days after the effective date of the permit. The SWPPP is designed to reduce or prevent the discharge of pollutants in stormwater to the receiving waters and used as a tool to document the permittee’s compliance with the terms of the permit.

In addition, Section G in Special Conditions of the NPDES permit requires a Best Management Practice (BMP) plan be reviewed and updated to prevent or minimize the potential for the release of toxic substances from ancillary activities to the waters of the United States through plant site runoff, spillage or leaks, sludge or waste disposal, and drainage from raw material storage.

Pursuant to these requirements, this plan (“the Plan”) has been prepared as a combination of the SWPPP and the BMP plan. The Plan identifies potential sources of pollution that may reasonably be expected to affect the quality of the stormwater discharges and describes the BMPs implemented by BSC to prevent or minimize the potential for the release of toxic or hazardous pollutants to the waters of the United States. The Plan contains all the elements required by a SWPPP and a BMP plan listed in the NPDES permit.

In addition to the permit requirements, this plan also addresses the BMP monitoring and reporting requirements set forth in the Consent Decree signed between Environmental Protection Agency (EPA) and Pepco and entered by the U.S. District Court of the District of Columbia on May 19, 2017.

### 1.2 Plan Organization

This Plan is organized as presented in **Table 1-1**, with supplementary information in the Appendices. Sections that are applicable to the requirements of the SWPPP and BMPs plan are also indicated in the table.

<b>Table 1-1: Plan Organization</b>		
<b>Report Sections</b>	<b>SWPPP</b>	<b>BMPs Plan</b>
Section 1: Purpose, Organization, and Implementation of the SWPPP and BMPs plan	✓	✓
Section 2: General Site Information	✓	✓
Section 3: Potential Pollutant Sources	✓	✓
Section 4: Facility-Wide Best Management Practices	✓	✓
Section 5: SWPPP Certification	✓	
Section 6: Plan Modification	✓	✓

### 1.3 Plan Oversight and Implementation

This Plan is overseen and implemented through the coordinated efforts of various BSC's departments, including Environmental Services, Environmental Operations, Underground, Facilities, Fleet, Stores, Transformer Shop, and Transmission and Substations. It is under the overall oversight by the supervisor of Environmental Services department and is managed by an environmental services representative with the responsibility of implementing the SWPPP at the facility. Personnel from the other departments are trained to implement BMPs within their related area of expertise. Environmental Service has the overall responsibility for the successful implementation of the Plan. Training requirements for personnel involved in the oversight and implementation process of the BMPs are discussed in Section 4.2.8.

### 1.4 Plan Certification, Review, and Amendment

This Plan is reviewed annually and modified whenever:

- A change in design, construction, operation, or maintenance, which has a significant effect on the potential for the discharge of pollutants to the waters of the United States.
- A release of a reportable quantify of pollutants as described in 40 CFR §302.
- A determination by Pepco or EPA that the plan appears to be ineffective in achieving the general objectives of controlling pollutants in stormwater discharges form the Facility.
- Changes at BSC materially increase the potential for significant releases of toxic or hazardous pollutants.

Pepco shall amend and update this Plan within 14 days following any significant changes at the Facility affecting the plan. Any significant changes in amended or new versions of the SWPPP and BMPs plan shall



be re-certified by Pepco. Such re-certifications also shall be signed in accordance with the requirements identified in 40 CFR §122.22. The Plan certifications are presented in Section 5.

### **1.5 Plan Availability and Distribution**

A hard copy of the Plan will be maintained by a representative who manages the implementation of the plan from the Environmental Services department and will be available for inspection by designated representatives of the EPA and other authorized government agencies.

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## SECTION 2: GENERAL SITE INFORMATION

Occupying approximately 67 acres, the Facility is composed of three electric substations and a variety of administration, operation and maintenance activities, including office facilities, fleet services maintenance and a transformer maintenance shop, that support Pepco's electric transmission and distribution system in Washington, D.C., Virginia, and Maryland. This section provides general site information required by a SWPPP and a BMPs plan.

### 2.1 Facility Information

#### Facility Information

Name of Facility: Pepco Benning Service Center - East

Street: 3400 Benning Road, NE

City: Washington, D.C.

ZIP Code: 20019

NPDES ID: DC0000094

#### Latitude/Longitude

Latitude:

38.8970 ° N

Longitude:

-76. 9521 ° W

#### Method for determining latitude/longitude (check one):

☒ USGS topographic map (specify scale: 1:24000)

☐ GPS

☐ Other (please specify):

---

#### Horizontal Reference Datum (check one):

☐ NAD 27

☒ NAD 83

☐ WGS 84

Is the facility located in Indian country?

☐ Yes

☒ No

Are you considered a "federal operator" of the facility?

**Federal Operator** – an entity that meets the definition of "operator" in this permit and is either any department, agency or instrumentality of the executive, legislative and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.

☐ Yes

☒ No

Estimated area of industrial activity at site exposed to stormwater: 77 acres

#### Discharge Information

Name(s) of surface water(s) that receive stormwater from your facility: Anacostia River

Does this facility discharge industrial stormwater directly into any segment of an "impaired water"?

☒ Yes

☐ No



If Yes, identify name of the impaired water(s) and segment(s), if applicable: Anacostia River

Identify the pollutant(s) causing the impairment(s):

- Biochemical oxygen demand (BOD);
- Escherichia coli (E. coli);
- Chlordane;
- Dichlorodiphenyldichloroethane (DDD);
- Dichlorodiphenyldichloroethylene (DDE);
- Dichlorodiphenyltrichloroethane (DDT);
- Dieldrin;
- Heptachlor Epoxide;
- Polycyclic aromatic hydrocarbons (PAH);
- Polychlorinated biphenyls (PCBs);
- Arsenic;
- Copper;
- Zinc;
- Total Suspended Solids (TSS);
- Oil and Grease;
- Nitrogen, Phosphorus; and
- Trash.

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?

TSS, Copper, Zinc, and PCBs

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? If yes, please list the TMDL pollutants:

- BOD;
- E. coli;
- Chlordane;
- DDD;
- DDE;
- DDT;
- Dieldrin;
- Heptachlor Epoxide;
- PAHs;
- PCBs;
- Arsenic;
- Copper;
- Zinc;
- TSS;

- Oil and Grease;
- Nitrogen;
- Phosphorus; and
- Trash.)

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water?   ☐ Yes            ☒ No

## 2.2 Contact Information/Responsible Parties

### Facility Operator/Owner:

Pepco Holdings LLC  
701 9<sup>th</sup> Street, NW  
Washington, DC 20068

### SWPPP & BMP Contact(s):

Primary:

Ghirmay Berhe  
3400 Benning Road NE  
Washington, DC 20019  
Ghirmay.berhe@exeloncorp.com

Backup :

Lisa Thomas, Mgr. Environmental Services

## 2.3 Stormwater Pollution Prevention Team / BMP Committee

Each member of the Stormwater Pollution Prevention Team has ready access to the most updated copy of the facility SWPPP and other relevant documents. As one of the required elements of a BMPs plan, a BMP Committee is a group of individuals who are responsible for developing the BMPs plan and assisting the plant management in its implementations, maintenance and updating. Thus, the Stormwater Pollution Prevention Team can also serve as the BMP Committee. In this plan, the Stormwater Pollution Prevention Team and the BMP Committee refer to the same group of members listed in the table below.

<b>Table 2-1: Stormwater Pollution Prevention Team/BMP Committee</b>	
<b>Staff Names</b>	<b>Responsibilities</b>
Jamie Hill, Manager Environmental Management	Authorized signatory authority for SWPPP certification and future annual reports. Certifying at least annually that the previous year's inspections and maintenance activities were conducted, results were recorded, records were maintained, and that the facility is in compliance with the plan.
Ghirmay Berhe, Sr. Engineer, Environmental Services	Oversite of the program for SWPPP and BMP plan development and updates;
Supervisor or Supervisor's Designee from the following departments:  Environmental Operations; Underground; Facilities; Fleet; Stores; Transformer Shop; Transmission & Substation (T&S)	Reporting spills as required, coordinating clean-up efforts, implementation of other applicable plans, monitoring stormwater as necessary, and completion of employee training needed. Responsible for inspections and maintenance.  Assisting their department employees in awareness of the plan, BMPs, material management, and assisting managers on other SWPPP duties. Training is completed annually for all employees on goals of stormwater pollution prevention, including spill prevention, response, and reporting; good housekeeping; materials management; procedure updates; and review and revision of SWPPP as needed.

## 2.4 Facility and Operations

The Facility consists of an irregularly shaped parcel of approximately 67 acres in northeast Washington, D.C. It is bounded by Foote Street and I-295 to the east, Benning Road to the south, Anacostia Avenue to north, and Pepco's Benning Service Center - West to the west. The additional surrounding areas generally consists of residential properties to the East, DC transfer station to the North and Benning Road and Metro tracks to the South. See **Figure B-1** in **Attachment B** for the general location map.

Employees work in maintenance and construction of Pepco's electric transmission and distribution (T&D) system; system engineering; vehicle fleet maintenance and refueling; and central warehousing for materials, supplies and equipment needed to operate the Pepco electrical distribution system. The facility is enclosed by a fence with two guarded entrances that are monitored 24 hours per day, 7 days per week. The current physical layout of the facility (Activities and Operations) is presented in **Table 2-2** and **Figure B-3** in **Attachment B**.



Table 2-2: Facility Layout			
Areas			Managing Department
Warehouse and Storage Areas (WS Areas)	WS-1	Storage Area South of Substation 7	Stores
	WS-2	Building 40, 41, 42, 60, 61, 66 - Stock and Non-Stock Storage Warehouses	Stores
	WS-3	Storage Area North of Building 67 and East of Building 45 (Salt Storage)	Stores
	WS-4	Building 88 - Central Storage Warehouse Facility	Stores
	WS-5	Storage Area South of Substation 41	Stores
	WS-6	Storage Area South of Building 68	Stores
	WS-7	Salvage Yard	Stores
	WS-8	Pole Storage Yard on Northwest Corner of Property	Stores
	WS-9	Building 35 & 65 - Stock and Non-Stock Storage Warehouses and Transformer Yard	Stores
	WS-10	Storage Area West of Fueling Station	Project Management
Fleet Service Areas (FS Areas)	FS-1	Building 75 - Fleet Service, General Shop Services, and Training Department	Fleet
	FS-2	Building 32 (Northern) Vehicle Wash	Fleet
	FS-3	Fueling Station	Fleet
Transformer Shop (TS Areas)	TS-1	Building 56, 57, And T&D Holding Area - Transformer Repair and Test Shops	Transformer shop, T&S, and other departments
	TS-2	Transformer Staging Area Outside of Building 56	Transformer Shop
Environmental Operations (EO))	EO-1	Building 68 - RCRA and TSCA Regulated Materials Containment Building	Environmental Operations
	EO-2	Building 67 - Offline Scrap Transformer Storage	Environmental Operations
	EO-3	Oil/Water Separator	Environmental Operations

Table 2-2: Facility Layout			
Areas			Managing Department
	EO-4	Water Treatment Trailer and Frac Tanks	Environmental Operations
	EO-5	Soil Storage, O/W Separator, Hotspot 4 Area	Environmental Operations
	EO-6	Construction Materials (Northwest of Substation 7)	Environmental Operations
	EO-7	Fueling Island Retention Basin Area / Spare Empty Frac Tank	Environmental Operations
Substations (SS Areas)	SS-1	Substation 45 - 115 Kv Switchyard	T&S
	SS-2	Substation 41 - 69 Kv Switchyard	T&S
	SS-3	Substation 7 - 230 Kv Switchyard	T&S
	SS-4	Building 57 Oil Storage and Operations	T&S
	SS-5	Building 29 - Transformer Oil Aboveground Storage Tanks	T&S
	SS-6	Spare Equipment Staging Area, West of Salvage Yard	T&S
	SS-7	Spare Transformer Area – Foote Street Area	T&S
Facilities Management (FM Areas)	FM-1	Employee Parking	Facilities
	FM-2	Employee Parking	Facilities
	FM-3	Employee and Fleet Services Parking	Facilities
	FM-4	Employee Parking	Facilities
	FM-5	Employee Parking	Facilities
	FM-6	Building 45 - Salt Shed	Facilities & Stores
	FM-7	Employee Parking	Facilities
	FM-8	Contractor Lay-down yard	Facilities
	FM-9	Building 36 - Facility Storage	Facilities

Table 2-2: Facility Layout			
Areas			Managing Department
	FM-10	Laydown Yard South of Substation 45	Facilities
Facilities Management Cont'd. (FM Areas)	FM-11	Building 38 Fire Pump House	Facilities

The activities that occur outdoors and could be potentially exposed to stormwater include:

- Operation and maintenance activities at switchyards/substations
- Aboveground storage tank (AST) loading and unloading activities
- Equipment and materials storage, loading and unloading, and transportation in outdoor storage areas
- Vehicle and equipment fueling at the fueling station
- Oil/Water separator operations

The activities that occur indoors include:

- Vehicle fleet maintenance.
- Transmission and distribution facility operation
- Transformer repair, testing, draining, and oil pumping operations
- Equipment and material storage
- Hazardous waste handling

Stormwater runoff from the Facility is conveyed through a storm drain system and is discharged to the Anacostia River and City storm drains at various outfalls. The majority of the stormwater runoff from the Facility is conveyed through a 48-inch then 54-inch main storm drainpipe to the Anacostia River at Outfall 013. The remaining areas at the facility flow to the Municipal Separate Storm Sewer System (MS4) owned and operated by the Government of the District of Columbia. See **Figure B-2** in **Attachment B** for the drainage areas and outfalls.

Pepco entered into a Consent Decree in 2017 that requires certain control measures to achieve compliance with the NPDES permit with respect to discharges of metals and other pollutants from the Facility into the Anacostia River. These measure include inlet controls and the operation of certain stormwater treatment systems.

## 2.5 Environmental Policy

As a subsidiary of Exelon, Pepco shares Exelon's Environmental Policy (EN-AC-1, Revision 5), which present the "Policy Statement" as follows:

*Our ability to serve customers, create value for investors and contribute to our employees' and communities' shared expectations for the future directly depends on how well we manage our interactions with the environment. We are committed to sustaining our*



*ecosystems and natural resources through pollution prevention and continually improving our environmental performance. We will:*

- Promote a corporate culture in which we are accountable to our communities and the environment and in which full compliance with environmental laws and regulations is the minimum level of acceptable performance;*
- Balance meeting future energy needs and contributing to economic growth with delivering sustainable solutions that are clean, affordable, reliable and provide customers the choices they expect; and*
- Engage our stakeholders and our employees to preserve, restore and enhance habitats and biodiversity.*

As “Policy Intent”, Exelon shall:

- Comply with all applicable environmental laws, regulations, and other commitments, with the objective of moving beyond compliance;*
- Take a risk management approach to addressing the environmental impacts of our operations;*
- Engage customers to develop and deliver innovative energy products and services that help them achieve their sustainability goals; and*
- Actively seek relevant partnerships and publicly communicate our environmental performance.*

The policy is applicable to all Exelon companies, and is implemented by maintaining and continuously improving a corporate-wide Environmental Management System conformant with the International Organization for Standardization 14001 Environmental Management System.

## **2.6 General Location Map**

The general location map for this facility is presented as **Figure B-1** in **Attachment B**.

## **2.7 Drainage Map**

The drainage map for this facility is presented as **Figure B-2** in **Attachment B**.

## **2.8 BSC Activities and Operations Map**

The BSC Activities and Operations Map for this facility is presented as **Figure B-3** in **Attachment B**.

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## SECTION 3: POTENTIAL POLLUTANT SOURCES

This Section describes potential pollutants associated with the activities at the Facility and their locations. All areas are identified and assessed for their potential to release hazardous contamination to the environment. Industrial materials or activities that are exposed to stormwater are also discussed.

### 3.1 Potential Pollutants Associated with Facility Activity

The table below lists the potential pollutants or pollutant constituents that are associated with the activities at the Facility identified in Section 2.4.

<b>Table 3-1: Potential Pollutants Associated with Industrial Activities at BSC</b>	
<b>Industrial Activity</b>	<b>Potential Pollutants</b>
Warehouse and Storage Operations	Metals, suspended solids
Fleet Services	Gasoline, diesel fuel, engine oil, metals
Transformer and Oil Operations	PCBs, waste aerosol cans, mixed waste of oil, solvents
Fueling Operations	Gasoline, diesel, vehicle related fuel and oils
Waste Management	PCBs, metals, sediment, suspended solids
Substation Operation and Maintenance Activities	Transformer oil, cable oil, PCB contaminated oils, diesel fuel
Fleet Vehicle Parking	Gasoline, diesel fuel, engine oil, metals
Road Deicing	Salt

### 3.2 Risk Identification and Assessment

All areas associated with Pepco's NPDES permit have been assessed for their potential to release hazardous contamination to the environment. The potential pollutants for each area have been identified, as well as the BMPs in place to reduce or eliminate the potential for release.

#### 3.2.1 Warehouse and Storage Areas (WS Areas)

Warehouse/storage areas consist of various buildings and outdoor storage areas on site.

##### 3.2.1.1 WS-1 (Storage Area South of Substation 7), WS-5 (Storage Area South of Building 44), WS-6 (Storage Area South of Building 68), and WS-10 (Storage Area West of Fueling Station).

Area WS-1 is an outdoor storage area on asphalt located to the south of Substation 7. This area is used for storage of cable spools and spool reels. WS-5 is used for storage of smaller electrical equipment (typically on pallets), small cable reels and other electrical equipment. Area WS-6 and WS-10 are outdoor storage areas that are layered with gravel and grass area and are used for storage of various cable spools, metal



spool reels, wooden spool reels and associated electrical equipment. These four areas are managed by the Stores department.

Cables are coated with insulation (e.g., ethylene-propylene rubber-based coating) to prevent cable metals from being exposed to the environment. However, outdoor cable spools storage areas pose a risk for stormwater contamination if the insulation is impaired, and the metal part of the cable becomes exposed to precipitation. The potential exists for the contamination of stormwater with inorganic compounds (e.g., iron, copper, or aluminum in cables and metal cable reels) by the continuous and gradual corrosion of metal parts exposed to precipitation in outdoor storage areas.

#### **3.2.1.2 WS-2 (Building 40, 41, 42, 60, 61, and 66) and WS-3 (Storage Area across from Building 67)**

Storage area WS-2 consists of Building 40, 41, 42, 60, 61, 66, and the outdoor storage area to the west of these buildings. Area WS-3 is an outdoor storage area on gravel and grass located North of Building 67 and the Building 44 parking lot.

New equipment and raw materials are stored indoors and outdoors in these two areas. Storage of items include PVC pipes and pipe fittings, metal pipes and pipe fittings, manhole lids, metal frames, circuit breakers, concrete pipes, concrete blocks, bushings, and miscellaneous parts.

Indoor storage is not exposed to stormwater. The potential exists for the contamination of stormwater with inorganic compounds (e.g., iron or aluminum in metal frames, pipes, and manhole lids) by the continuous and gradual corrosion of metal parts exposed to precipitation in outdoor storage areas.

#### **3.2.1.3 WS-4 (Building 88)**

Storage area WS-4, Building 88, serves as the central storage warehouse facility located in the center part of the site. Stock in Building 88 include materials, equipment, and supplies needed to operate the Pepco electrical distribution system. Loading and unloading operations occur at the loading dock area located on the north side of the building. Outside areas around Building 88 include waste and storage dumpsters on the eastern side of the building, vehicle parking on the south side, an emergency diesel generator on the east side. The work area on the north side of the building is protected by an overhead awning.

Potential spill or release of pollutants could happen if spills/leaks occur during the transporting, loading, and unloading processes associated with moving materials. Indoor storage is not exposed to stormwater. The potential exists for the contamination of stormwater with inorganic compounds (e.g., iron or aluminum in metal frames, pipes, and manhole lids) by the continuous and gradual corrosion of metal parts exposed to precipitation in outdoor storage areas along with exposure of recycling and trash bins to weather.

#### **3.2.1.4 WS-7 (Salvage Yard)**

Area WS-7 is a salvage yard located at the center of the Facility. This concrete area is used to stage enclosed roll-offs used for storage of only scrap metals derived from other operations. There are several roll-offs used for trash storage staging on the concrete pad. Multiple dumpsters are lined up along the western side of Building 88 and used for storage of various recyclable items. Pepco has a scrap yard policy to ensure that necessary controls are implemented to prevent unacceptable items from entering the scrap yard and to be subsequently recycled or reused.

### **3.2.1.5 WS-8 (Pole Storage Yard)**

Area WS-8, located on the Northwest section of the property, is used to store utility poles. The poles are stored off the ground above a gravel yard. Access is maintained to the pole storage area for incoming and outgoing plies. The potential exists for contamination of stormwater from compounds associated with the preservatives used on the poles.

### **3.2.1.6 WS-9 (Transformer Yard and areas around Building 65 and 35)**

Storage area WS-9 consists of Building 35 and Building 65, both of which are located in the western portion of the Facility and used for general storage along with the outdoor transformer storage areas located in the northwestern portion of the Facility with both areas layered with gravel on the ground. Both areas are used for staging various new transformers.

These areas are managed by the Stores department. Outdoor transformer storage areas pose a risk for stormwater contamination if spills and/or leaks of transformer oil occur during transport, loading, and unloading operations. In addition, the potential exists for the contamination of stormwater with inorganic compounds (e.g., iron or aluminum in metal frames, beams, and pipes) by the continuous and gradual corrosion of metal parts exposed to precipitation in outdoor storage areas.

#### Structural BMPs for WS areas:

- Inlets have inlet protection controls (fabric filters, Stormexx or Abtech treatment units)
- Salvage Yard has a Contech Jellyfish and Stormfilter treatment train to treat all of the run-off from the Salvage Yard area.

#### Non-structural BMPs for WS areas:

- Indoor storage of materials and equipment is arranged wherever possible to minimize exposure to stormwater.
- Good housekeeping practices are implemented for storage areas. Refer to Section 4.2.1 for details of good housekeeping BMPs.
- Routine inspections are implemented for the storage areas and the associated structural control measures. Refer to Section 4.2.3 for the details of inspection programs.
- Scrap metals are stored in the bulk roll-off containers and are exposed to precipitation. The potential exists for the contamination of stormwater by the continuous and gradual corrosion of scrap metal exposed to precipitation. Lids or water-resistant covers are provided to the extent possible for outdoor scrap metal containers to reduce the potential risks of stormwater contamination.

### **3.2.2 Fleet Service Areas (FS Areas)**

Fleet service areas include Building 75, Fueling Island and the northern part of Building 32.

#### **3.2.2.1 FS-1 (Building 75)**

Area FS-1 consists of Building 75 and the used oil storage tank located outdoor at the southern side of Building 75. This area is managed by the Fleet department. Located in the central part of BSC, Building 75 serves as a major hub for vehicle repair and maintenance. Activities occur inside Building 75 and are not exposed to stormwater. Spills/leaks are contained by specific containment or the building floors and walls. Used oil derived from vehicle repair and maintenance is stored in the used oil storage tank. Accumulated

used oil in the tank is transported offsite for proper disposal. This area poses a risk for stormwater contamination during pumping and loading operations at the used oil tank.

### **3.2.2.2 FS-2 (Northern Part of Building 32)**

Area FS-2 includes northern part of Building 32, which is located on the southwest part of BSC. This part of Building 32 contains a wash bay for vehicle cleaning. This area is managed by the Fleet department. The wash bay is only used for Pepco fleet vehicles and no personal vehicle is allowed. Vehicle washing is conducted only in the wash bay. Wastewater from vehicle washing is drained to a concrete vault located underground to the northwest corner of Building 32. The concrete vault is approximately 10 meters north of I-83 and has two manholes for each side of the vault chamber. The vault is pumped approximately every quarter and the wastewater is transported and properly disposed of at an approved Exelon facility.

#### Structural BMPs for FS-1 and FS-2 areas:

- Sufficient containment is provided for work areas in Building 75.
- Used oil is stored in the used oil tank outside Building 75 and disposed properly off-site. The oil tank is of double-walled steel construction providing secondary containment.

#### Non-structural BMPs for FS-1 and FS-2 areas:

- Routine inspections are implemented for the areas and the associated structural control measures. Refer to Section 4.2.3 for the details of inspection programs.
- Good housekeeping practices are implemented. Refer to Section 4.2.1 for details of good housekeeping BMPs.

### **3.2.2.3 FS-3 (Fueling Station)**

Area FS-3 is a gasoline and diesel fueling station that has one 12,000-gallon diesel AST and one 12,000-gallon gasoline AST to the north of the fueling operation area, which is covered by a canopy. This area is managed by the Fleet department. The fueling station is surrounded by concrete curb in the east, north, and west. The southern side of the fueling station is partially curbed by a concrete island used to stage a spill equipment storage container and several trash cans. Vehicle enters and exits the fueling station from the southern side without concrete curb. Outside the concrete curb is a vegetation area that surrounds the entire fuel station in the east, north, and west. Two bioretention ponds are constructed within the vegetation area.

Potential pollutants in this area are petroleum hydrocarbons, such as gasoline, diesel, vehicle related leaks of fuels or oils. These materials will only be exposed to stormwater if spill/leaks occur during the loading and pumping operations for the ASTs, and if leaks occur from the ASTs and the associated pipeline.

#### Structural BMPs for FS-3 area:

- The two 12,000-gallon ASTs are double-wall steel tanks that provide total containment protection.
- The fueling area is provided with a canopy to minimize exposure to precipitation. Sufficient containment is provided by concrete curb for the fueling area.
- Two bio-retentions ponds (SWP-1 and SWP-2) are constructed partially surrounding FS-3 area. Stormwater runoff in FS-3 area is drained to the bio-retention ponds before entering the storm drain system.



Non-structural BMPs for FS-3 areas:

- Inspection is conducted by Fleet department on a monthly basis. Inspection includes checking the AST system for alarms/abnormal conditions, sensors, probes, and the condition of the fuel dispensers and associated delivery hoses. All ASTs at the facility are inspected in accordance with the requirements of the Steel Tank Institute "Standard for the Inspection of Aboveground Storage Tanks" - SP001 dated January 2018. The shop-built ASTs at the facility are considered to have continuous release detection monitoring and spill control; therefore, the tanks can be classified as SP001 Category 1. Category 1 tanks under 5,000 gallons only required periodic visual inspections. Category 1 tanks between 5,001 and 30,000 gallons require periodic visual inspections and formal external visual inspections every 20 years. Specific guidelines for performance of the periodic inspections and periodic/episodic integrity are detailed both standards, which provide environmental protection equivalent to the integrity testing under 40 CF 112.8(c)(6). Refer to BSC's SPCC plan for inspection details.
- Spill kit(s) are stationed at the fueling station and inspected monthly.

**3.2.3 Transformer Shop Areas (TS Areas)**

Transformer shop and associated oil operations areas include Building 56, Building 57, the outdoor T&D Holding area between these two buildings, the outdoor storage area adjacent to Building 56, Building 29, and the outdoor oil filtration area to west of Building 29.

**3.2.3.1 TS-1 (Building 54 and 56 Outdoor Areas) and TS-2 (Building 56 T&D Holding Area)**

Areas TS-1 and TS-2 consists of Building 56, Building 57, the T&D Holding area between these two buildings, and the outdoor storage area to the southeast and southwest of Building 56.

Located on the southeast corner of the Facility, Building 56 is a transformer shop used for the service and repair of transformers and other electrical equipment. Out-of-service transformers are staged at the T&D Holding area, a covered structure located outside of Building 56, with an approximately 42 feet by 22 feet concrete pad surrounded by a 1-foot-high concrete berm. All materials delivered to this area are tested for PCB content. Recovered oil containing 50 parts per million (ppm) PCBs or greater is drummed and moved to a TSCA approved storage facility in Building 68 in the western portion of the Facility for storage pending off-site disposal at an audited and approved disposal facility. Recovered oil containing less than 49 ppm PCBs is pumped to one of two 10,000-gallon holding tanks in Building 57 designated for accumulating oil containing  $\leq 49$  ppm PCBs. Accumulated oil from these two tanks is transported off-site for recycling. The outdoor storage area adjacent to Building 56 is used for staging transformers and temporarily staging 55-gallon drums containing non-hazardous waste derived from operations in area TS-2. The drums will be transferred to Building 68 for storage and disposal. Building 56 and the T&D Holding area are managed by the Transformer Shop department, and Building 57 is managed by the Transmission and Substation department.

Potential pollutants in this area include PCB-containing oil, oil-contaminated equipment and associated parts, waste aerosol cans, and mixed waste of oil and solvent. These materials will only be exposed to stormwater if spill/leaks occur during the transport of transformers and storage drums, and during drum loading operation. Potential risks also exist for contamination of stormwater if pipelines carrying drained oil to Building 57 leak.

Structural BMPs for TS areas:

- Both the T&D Holding area and the ASTs in Building 29 are provided with canopy structures to minimize exposure to stormwater.
- The T&D Holding area is surrounded by a 1-foot-high concrete berm to contain potential spill/leaks. Retained water in the containment is discharge manually after inspection for contamination, or automatically through special valves controlled by oil sensors.
- A concrete berm structure provides sufficient containment for the ASTs in Building 29. The containment volume is estimated to be 76,800 gallons, which is more than the total volume of all four ASTs in Building 29.
- Control measures are implemented to filter sediment and metals in runoff at stormwater inlets and catch basins in or near the areas. Refer to Section 4.1.4 for details of the control measures.

Non-structural BMPs for TS areas:

- Good housekeeping practices are implemented. Refer to Section 4.2.1 for details of good housekeeping BMPs.
- Oil loading and unloading operations are always attended by workers at all times.
- Routine inspections are implemented for the areas and the associated structural control measures. Refer to Section 4.2.3 for the details of inspection programs.
- Oil-filled electrical equipment, tanks and their associated piping and sumps, containment structures, and oil drums are visually inspected as recommended internally by the asset owner or as specified by the Steel Tank Institute SP001 standard for leaks and evidence of deterioration. All ASTs at the facility are inspected in accordance with the requirements of the Steel Tank Institute "Standard for the Inspection of Aboveground Storage Tanks" - SP001 dated January 2018. The shop-built ASTs at the facility are considered to have continuous release detection monitoring and spill control; therefore, the tanks can be classified as SP001 Category 1. Category 1 tanks under 5,000 gallons only required periodic visual inspections. Category 1 tanks between 5,001 and 30,000 gallons require periodic visual inspections and formal external visual inspections every 20 years. Specific guidelines for performance of the periodic inspections and periodic/episodic integrity are detailed both standards, which provide environmental protection equivalent to the integrity testing under 40 CF 112.8(c)(6). Refer to BSC's Spill Prevention, Control, and Countermeasures (SPCC) plan for inspection details.

### **3.2.4 Environmental Operations (EO Areas)**

Environmental Operation areas at BSC consist of multiple operation areas throughout the Facility. A Hazardous Waste Contingency Plan (HWCP) has been created with details regarding the requirements, potential hazards identification, corresponding BMPs, as well as the reporting and training procedures for oil and chemical spill prevention and response. The existing practices and procedures for storage and handling oil and hazardous wastes implemented by Pepco as per the HWCP are sufficient to prevent runoff of hazardous materials.

#### **3.2.4.1 EO-1 (Building 68)**

Area EO-1 consists of Building 68 and the adjacent outdoor storage area to the east of Building 68. Building 68 is a 90-day storage building for RCRA listed hazardous and TSCA regulated materials. Recovered oil containing 50 parts per million (ppm) PCBs or greater is drummed and moved to Building 68 for storage. Building 68 also houses episodic waste events such as damaged batteries and damaged

lighting fixtures. Materials are stored in variable number of 55-gallon steel drums and various other DOT approved containers.

Potential pollutants in this area include RCRA and TSCA regulated hazardous materials (e.g., PCB-contaminated oil and parts). These materials are handled within Building 68 and will only be exposed to stormwater if spills/leaks occur during the loading and unloading operations occur outside of the building.

#### **3.2.4.2 EO-2 Building 67**

Building 67 contains a waste staging area for shipping of waste from PEPCO along with storage of materials used by Environmental Operations. Potential pollutants from EO-2 would be from spills from the transfer or equipment / drums as they are loaded from the building to a waste contractor vehicle.

#### **3.2.4.3 EO-3 Oil / Water Separator Area, EO-4 Frac Tank and Treatment Trailer and EO-7 Spare Frac Tank and Bio-Retention Pond Areas**

These three areas contain oily wastewater or other contaminated stormwater from manholes or other sites within the PEPCO territory. Potential pollutants from these areas could include PCB contaminated stormwater (EO-3), or oil contaminated stormwater.

#### **3.2.4.4 EO-5 Soil Storage and Sounding Area**

This area, when active, is used to store soil from on-site construction activities prior to disposal. Potential pollutants from this area are dependent on the soil being stored but could include metals, suspended solids, and other pollutants associated with soil pile run-off.

#### **3.2.4.5 EO-6 Construction Material Storage**

This area located Northwest of Substation 7 is for the storage of gravel, rock, mulch, soil and other construction related materials. Potential pollutants from this area are dependent on the material being stored but could include metals, suspended solids, and other pollutants associated with pile run-off.

### **3.2.5 Substation Areas (SS Areas)**

Active substation areas include the three substations located within BSC property. The three substations support electrical transmission and distribution within the District of Columbia.

#### **3.2.5.1 SS-1 (Substation 45), SS-2 (Substation 41), and SS-3 (Substation 7)**

Area SS-1 consists of substation 45, which is located on the southwest side of the BSC immediately adjacent to the Benning Road guard shack entrance. The property is approximately 1.04 acres. The ground surface at this substation consists of pavement, stone, and gravel with a general slope to the west. The substation is surrounded by a chain linked fence with locked access gates located at the southeast corner and north sides. Present on the property are various electrical equipment (some oil-filled with and without containment), a control house and cable troughs. Located along the western perimeter is a gutter drainage system which ties into an onsite storm drain on the southwest corner of the site. The site is bordered to the south by Benning Road NE, beyond which is a mixed commercial and residential area. Approximately 550 feet to the west is National Park Service (NPS) property bordering the Anacostia River.

Area SS-2 consists of substation 41, which is located on the north central portion of the BSC, west and adjacent to Building 44. The ground surface at this substation consists of pavement, stone, and gravel with a general slope to the northwest. The substation is surrounded by a chain linked fence with five locked

access gates located at various locations. Present on the property are various electrical equipment (some oil-filled with and without containment), a control house, oil pump house with operating tank, oil-filled cable aboveground terminations, an emergency generator with AST, cable troughs and an oil reclamation pit. To the northeast of the site are residential properties, NPS property, and educational facilities. To the northwest of the site is a District of Columbia trash transfer station and beyond that the Anacostia River (approximately 600 feet). This substation includes a high-pressure fluid filled (HPFF) cable system.

Area SS-3 consists of substation 7, which is located on the northeast side of the BSC property. The ground surface within the substation is a mixture of pavement, stone, and gravel with a general slope to the north. The substation is surrounded by a chain linked fence with five locked access gates located at various locations. Present on the property are various electrical equipment (some oil-filled with and without containment), two control houses, switch gear, a gas insulated substation, two oil pump houses with operating tanks, oil-filled cable aboveground terminations, an oil reclamation pit, an emergency generator with AST, and a communication tower. A gutter drainage system on the north side of the site drains to an oil and grit separator near the north corner of the site, which would then discharge to the storm sewer along Foote Street. The facility is surrounded by a paved service center road to west, beyond which are equipment storage warehouses; parking and equipment storage to the south, and Foote Street NE to the northeast, beyond which is a residential area. This substation includes an HPFF cable system.

All three areas are managed by the Transmission and Substation department. Activities taking place at the substations involve the handling, storage, and use of oil. The potential exists for stormwater contamination with oil if spills/leaks occur during these activities.

#### **3.2.5.2 SS-5 (Building 29 and Oil Filtration Area)**

Areas SS-5 is located in the central portion of the Facility. SS-5 is Building 29, a covered structure with an approximately 73 feet by 17 feet concrete pad, on top of which are four 12,000-gallon ASTs (Tank A, B, C, and D). Tank A and B are used for storage of new transformer oil, while Tank C and D are used for storage of used and processed transformer oil. Building 29 is surrounded by a concrete berm on the northern, eastern, and southern sides. Entrance to Building 29 is from the western side of the building and the floor slopes down towards the Eastern side.

SS-5 is managed by the Transmission and Substation department. Potential risk material in both areas is transformer oil, which will only be exposed to stormwater if spill/leaks occur during the transport, loading, and unloading of oil.

#### **3.2.5.3 SS-6 (Spare Transformer / Switches Staging Area West of Salvage Yard) and SS-7 (Spare Transformer Staging Area North of Substation 7)**

- Storage area SS-6 is located in the central portion of the Facility and used as an outdoor spare transformer and other electric equipment staging area. Two large inactive transformers are staged in a grassy area which is at the center of a pit layered with gravel and surrounded by gravel dikes.
- Area SS-7 is located near the northeastern corner of the Facility and used as an outdoor spare transformer staging area. Two large inactive transformers are staged on concrete pads within a secondary containment area surrounded by a concrete berm.
- Both areas are managed by the Transmission and Substation department. Outdoor transformer storage areas pose a risk for stormwater contamination if spills and/or leaks of transformer oil occur during transport, loading, and unloading operations.



Structural BMPs for SS areas:

- Refer to the SPCC plan for the substations in BSC and HWCP for detailed structural BMPs implemented for storage and handling oils and hazardous materials, including discharge controls, containment and diversionary structures such as secondary containment structures (i.e. earthen berm, asphalt curb, concrete pit, etc.), equipment installed to monitor liquid level, tank interstice, and dispenser sumps, sump sensors, leak detectors equipped on pipelines.
- Pad-mount transformers are surrounded by oil-absorbent booms.

Non-structural BMPs for SS areas:

- Refer to the SPCC plan for the substations in BSC and HWCP for detailed non-structural BMPs implemented for storage and handling oils and hazardous materials, including discharge prevention measures such as regular documented inspections and maintenance of oil-filled equipment, containers and tanks of 55 gallons or more, procedures for handling and transferring materials, continued training of staff, and limited site access to prevent accidental releases or vandalism.
- Release from the transformer would likely trigger a power outage, which would be immediately investigated.
- The Facility is manned during the day, which would facilitate the observation of an oil release by Facility staff.
- Any observed releases would be immediately responded to by site personnel.

### **3.2.6 Facility Management Areas (FM Areas)**

Facility Management areas include several outdoor parking areas (FM-1, FM-2, FM-3, FM-4, FM-5, FM-7) across the Facility, Salt Storage Building (FM-6), Contractor lay-down yards (FM-8 and FM-10), Storage Building (FM-9) and Fire Pump Storage Building (FM-11).

#### **3.2.6.1 FM-1, FM-2, FM-4, FM-5, and FM-7 (Employee Parking Lots)**

Areas FM-1 and FM-2 are located near the eastern corner of the Facility. Area FM-4 is to the east of Building 75. Area FM-5 is to the east of Building 44. Area FM-7 is located south of Building 29. All these areas are parking lots used for employee vehicle parking. These areas pose a risk of stormwater contamination with gasoline, diesel, and/or engine oil if spills/leaks occur from vehicles. Parking lots are also a source of suspended solids and metals.

#### **3.2.6.2. FM-3 (Fleet Service Vehicle and Employee Parking Area)**

Area FM-3 is a large parking lot used for both employee vehicle and Pepco service fleet vehicle parking, located by the southern boundary of the Facility. This area poses a risk of stormwater contamination with gasoline, diesel, and/or engine oil if spills/leaks occur from vehicles. Potential pollutants also include metals associated with vehicles (brake pad dust, exterior mud and debris)

#### **3.2.6.3 FM-6 (Salt Storage Building 45)**

Storage area FM-6, Building 45, is near northeastern boundary of the Facility. Used by the Facilities Management department, Building 45 is a partially enclosed, covered, and three-sided structure housing a salt storage pile. The area in front of Building 45 is graded to prevent runoff from getting into the building.

Straw bales are placed in the open side of the building to keep salt from contacting with stormwater. This area poses a risk for stormwater contamination during salt loading and unloading processes.

#### **3.2.6.4 FM-8 and FM-10 (Contractor Laydown Yards)**

The two contractor laydown yards are used by various contractors, as needed, for the temporary storage of equipment, vehicles, or materials. These areas pose a risk of stormwater contamination dependent on the contractor activities but could include gasoline, diesel, and/or engine oil if spills/leaks occur. Potential release of metals from the gradual corrosion of metal parts exposed to precipitation.

#### **3.2.6.5 FM-9 Building 36 Storage**

Building 36 is used for the storage of materials and is managed by the facilities department and includes a dumpster that stores site waste on the North side of the building. Potential release of pollutants from the dumpster and metals from any exposed material stored outside of the building and exposed to precipitation.

#### **3.2.6.6 FM-11 Fire Pump Building**

Building 38 houses a fire pump for fire fighting operations. Potential release of pollutants from this building are chlorinated water discharges associated with fire pump maintenance and testing activities.

##### Structural BMPs for FM areas:

- If a vehicle with potential for leaks is parked in the FM areas, a drip pan will be placed for containment of potential spills/leaks.
- Control measures are implemented at stormwater inlets and catch basins in or near the FM areas. Refer to Section 4.1.4 for details of the control measures.
- Water quality structures were constructed in or near the outdoor storage areas for treatment of stormwater runoff before it discharges to the storm drain system. The water quality structures include sand filter units as oil & grit separators and StormFilter® treatment units. Refer to Section 4.1.4 for details of the water quality structures.
- A boom and/or hay bales are placed in front of the entrance to the Building 45 to prevent unnecessary run-off of de-icing materials.
- Booms are placed at locations, as necessary, to prevent the run-off of materials from the contractor storage areas.

##### Non-structural BMPs for FM areas:

- Inspections are conducted monthly for fuel and/or oil leaks from vehicles parking in the FM areas. Spills/leaks will be immediately responded to if identified.
- Specific BMPs for Contractor laydown yards

##### Contractors using the laydown areas must follow the following BMPs.

- Material is to be stored indoors or covered
- The use of pallets or other material will be used to keep equipment from sitting directly on the ground
- Dumpster or storage bins will be covered and are in good condition with no exterior rusting
- Any chemicals or oils must be stored in secondary containment, and under cover if possible
- Spill kits are required to be on-site and inspected if chemical handling, fueling or similar type of activities are performed

- Good housekeeping is required in all areas
- Only stormwater can be discharged from the laydown area (ex. no vehicle or equipment washing is allowed).
- Oil absorbent or metal absorbing booms shall be used as needed downstream of activities that involve oil or material storage.

### **3.2.7 Underground Operations (UG Areas)**

#### **3.2.7.1 UG1 (Building 32)**

Building 32 is used by Pepco's Underground Maintenance and Construction group for storage. Potential pollutants from the use of this building is metals from building corrosion and from the storage of material outside of the building.

#### **3.2.7.2 UG2 (Storage Area North of Building 65)**

This storage is North of Building 65 is used for the storage of equipment used to maintain the electrical distribution system. Potential pollutants from this area include materials that would leak from the units and from vehicles used to move this associated equipment.

##### Structural BMPs for UG areas:

- If a vehicle with potential for leaks is parked in the UG areas, a drip pan will be placed for containment of potential spills/leaks.
- Control measures are implemented at stormwater inlets and catch basins in or near the UG areas. Refer to Section 4.1.4 for details of the control measures.

##### Non-structural BMPs for FM areas:

- Routine inspections are implemented for the areas and the associated structural control measures. Refer to Section 4.2.3 for the details of inspection programs.

### **3.2.8 Training (TR Areas)**

#### **3.2.8.1 TR-1 (Training Trailers and Parking Lot West of Building 75)**

These areas pose a risk of stormwater contamination with gasoline, diesel, and/or engine oil if spills/leaks occur from vehicles. Parking lots are also a source of suspended solids and metals.

#### **3.2.8.2 TR-2 (Outside portions of Building 75 associated with Training)**

This area outside of the training portion of Building 75 contain a loading dock, dumpsters and an outside training area. Potential pollutants from this area include containments associated with material corrosion and training activities.

##### Structural BMPs for TR areas:

- If a vehicle with potential for leaks is parked in the TR areas, a drip pan will be placed for containment of potential spills/leaks.

- Control measures are implemented at stormwater inlets and catch basins in or near the TR areas. Refer to Section 4.1.4 for details of the control measures.

Non-structural BMPs for TR areas:

- Routine inspections are implemented for the areas and the associated structural control measures. Refer to Section 4.2.3 for the details of inspection programs.

### 3.3 Inventory of Exposed Materials

Refer to the SPCC plans for detailed inventory of oil-containing equipment and devices. Areas located indoors are not exposed to stormwater and are equipped with sufficient control measures to contain runoff. Releases from indoor areas are not likely to affect stormwater discharge at the facility.

The BSC discharges stormwater to Anacostia River through Outfall 013 and Outfall 101 only. The majority of the stormwater runoff from the service center is conveyed to the Anacostia River at Outfall 013. A smaller area of the site to the west of the former power plant area drains stormwater to the Anacostia River at Outfall 101. Currently there is no industrial activity occurring within the Outfall 101 drainage area. The remaining areas at the facility flow to the MS4 owned and operated by the Government of the District of Columbia. Table 3-2 describes the areas and potential pollutants exposed to stormwater. Refer to Figure B-2 in Attachment B for drainage areas and outfall locations.

Table 3-2: Inventory of Exposed Materials of Potential Contamination		
Areas and Potentially Exposed Material	Description of Potential Exposure	Discharge Points that are likely to be affected
WS-1: Storage Area South of Substation 7 (spools of electrical cable)	Exposed to precipitation	Outfall 013
WS-2: Storage Areas Around Buildings 40,41,42,60,61, and 66)	Exposed to precipitation	Outfall 013
WS-3: Storage Area North of Building 67 (metal manhole covers , concrete pipe components, and metal frames)	Exposed to precipitation	Outfall 013
WS-4: Building 88 Generator (generator set diesel tank)	Only exposed to stormwater if spills/leaks occur from the generator and when loading diesel tanks.	Outfall 013



**Table 3-2: Inventory of Exposed Materials of Potential Contamination**

<b>Areas and Potentially Exposed Material</b>	<b>Description of Potential Exposure</b>	<b>Discharge Points that are likely to be affected</b>
WS-5: Storage Area North of Building 88 (various oil-containing transformers with volumes up to 590 gallons, metal frames, metal pipes, cable spools)	Transformers - Only exposed to stormwater if spills/leaks from transformers occur.  Material Storage – Exposed to precipitation	Outfall 013
WS-6: Storage Area South of Building 68 (spools of electrical cable)	Exposed to precipitation	Outfall 013
WS-7: Salvage Yard (various metal components/pieces)	Equipment and metal components are stored in closed dumpsters to avoid contact with precipitation. Only exposed to stormwater during transport of the equipment or components.	Outfall 013
WS-8 Pole Storage yard (storage of pressure treated poles)	Exposed to precipitation	Outfall 013
WS-9: Storage/Laydown Area North and East of Buildings 35 & 65 (various oil-containing transformers with volumes up to 752 gallons)	Only exposed to stormwater if spills/leaks from transformers occur.	Outfall 013
WS-10: Storage Area West of Fueling Station (spools of electrical cable)	Exposed to precipitation	Outfall 013
FS-1: 250-gallon Used Oil AST South of Building 75 (oils)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur	Outfall 013
FS-3: Fueling Station and ASTs (one 12,000-gallon diesel AST and one 12,000-gallon gasoline AST)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur from vehicles and equipment fueling activities, and/or from loading and unloading ASTs.	Outfall 013

**Table 3-2: Inventory of Exposed Materials of Potential Contamination**

<b>Areas and Potentially Exposed Material</b>	<b>Description of Potential Exposure</b>	<b>Discharge Points that are likely to be affected</b>
TS-1 & TS-2: T&D Holding Area (various oil-containing transformers; storage drums with oils or oil-contaminated solid waste)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur during the transport of transformers and drums, and during drum loading operation.	Outfall 013
TS-1: Building 56 Generator (generator set diesel tank)	Only exposed to stormwater if spills/leaks occur from the generator and when loading diesel tanks.	Outfall 013
EO-3: Oil/Water Separator (various oils in the two 8,000-gallon concrete holding vaults without cover; various storage drums for debris and used skimmer filters)	Only exposed to stormwater if spills/leaks occur during oil/water separator operations, and during drum loading and transporting activities.	Outfall 013
EO-4: Water Treatment Trailer with Frac Tanks (manhole water)	Only exposed to stormwater if spills/leaks occur during loading and unloading activities.	Outfall 013
EO-5: Storage Area to the West of Substation 41 (soils)	Exposed to precipitation	Outfall 013
EO-6: Storage Area Northwest of Substation 7 (construction materials: soils, sand, stone, and bricks)	Exposed to precipitation	Outfall 014
SS-1: Substation 45 (various oil-containing transformers and equipment with volume up to 25,388 gallons)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur during the transport of contaminated water from containments.	Outfall 006

**Table 3-2: Inventory of Exposed Materials of Potential Contamination**

<b>Areas and Potentially Exposed Material</b>	<b>Description of Potential Exposure</b>	<b>Discharge Points that are likely to be affected</b>
SS-2: Substation 41 (various oil-containing transformers and equipment with volume up to 30,130 gallons; and an AST with volume of 660 gallons)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur during the transport of contaminated water from containments, and during loading and unloading ASTs.	Outfall 013
SS-3: Substation 7 (various oil-containing transformers and equipment with volume up to 18,000 gallons; and two ASTs with volumes of 1,000 gallons and 70 gallons, respectively)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur during the transport of contaminated water from containments, and during loading and unloading ASTs.	Outfall 013, 015 & 401
SS-4 Building 57 (Substation Oil Operations)	Only exposed to stormwater if spill/leaks occur during operations	Outfall 013
SS-5: Building 29 (four new and used mineral oil ASTs with volume of 12,000 gallon each)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur during loading and unloading the ASTs	Outfall 013
SS-6: Oil Filtration Facility to the West of Building 29 (used oil)	Only exposed to stormwater if spills/leaks occur during operations	Outfall 013
SS-6: Storage Area North of Building 29 (two oil-containing transformers with volumes of 10,989 gallons and 13,550 gallons)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur during the transport of transformers.	Outfall 013
SS-7: Storage Area North of Substation 7 (various oil-containing transformers)	Sufficient containment provided. Only exposed to stormwater if spills/leaks occur during the transport of transformers	Outfall 401
FM-3: Fleet Truck Parking Area around Building 59 (Engine oil, gasoline, and diesel fuel)	Only exposed to stormwater if spills/leaks from fleet vehicles occur	Outfall 013

<b>Table 3-2: Inventory of Exposed Materials of Potential Contamination</b>		
<b>Areas and Potentially Exposed Material</b>	<b>Description of Potential Exposure</b>	<b>Discharge Points that are likely to be affected</b>
FM-6: Salt Storage Building (salt for deicing)	Only exposed to stormwater during salt loading and unloading.	Outfall 013
FM-8: Contractor Laydown Yard (Engine oil, gasoline, and diesel fuel)	Only exposed to stormwater if spills/leaks from fleet vehicles occur and material exposed to precipitation	Outfall 006
FM-10 Laydown Yard (Equipment and Vehicles stored Outdoors)	Only exposed to stormwater if spills/leaks from fleet vehicles occur and material exposed to precipitation	Outfall 016

No significant spills or leaks of oil, toxic or hazardous substances have occurred in the past three years in areas draining to a stormwater conveyance at the BSC.



## **SECTION 4: FACILITY-WIDE BEST MANAGEMENT PRACTICES**

This section includes both structural BMPs and non-structural BMPs that have been implemented at the BSC to comply with the requirements of SWPPP and BMP plans in the NPDES permit.

### **4.1 Structural BMPs**

#### **4.1.1 Minimize Exposure**

Preventing stormwater from coming into contact with potential pollution sources is generally more effective and less costly than removing pollutants from stormwater. Multiple structural controls and procedures are implemented and maintained at BSC to minimize the exposure of industrial activities to rain, snow, snow melt, and runoff. Industrial activities, such as hazardous waste management, vehicle maintenance, certain equipment and material storage, and transformer processing, are conducted in designated indoor areas with sufficient containment measures to avoid exposure to stormwater. Various containment structures were implemented to prevent potential pollutants from contact with stormwater runoff.

##### Containment Structures

Various containment structures were implemented to prevent potential pollutants from contact with stormwater runoff. Secondary containment basins for active transformers and ASTs provide sufficient containment volumes for spills or leaks. Solid concrete floors and surrounding curbs/berms are provided at the T&D holding area where off-line transformers are drained and processed. These activities take place in a designated area under a canopy. Retained water in the containments is discharged manually after inspection for contamination, or automatically through special valves controlled by oil sensors. This practice prevents spills/leaks or contaminated water from contact with stormwater runoff and discharging to the outfalls. Refer to the SPCC plans for details of various containment structures.

##### Canopy Structures

Canopies are provided in outdoor locations at the fueling station area, the T&D holding area, and multiple loading dock areas. Fueling operations for vehicles and equipment, off-line transformers draining, and material loading/unloading processes are covered by canopies to avoid direct contact with precipitation.

##### Offline Scrap Transformer Storage (Building 67)

A storage building was constructed in December 2016 for the purpose of proper storage of off-line transformers that are in poor condition and designated for scrapping. Poor conditions increase the chance of spills/leaks from the transformers. The transformers are placed inside Building 67 prior to processing or disposal, where potential spills and leaks from the transformers are contained by control measures within the building, eliminating exposure to stormwater. An outdoor containment area is also constructed to the south of Building 67 for transformers drop-off and temporary staging.

Industrial activities, such as hazardous waste management, vehicle maintenance, certain equipment and material storage, and transformer processing, are conducted in designated indoor areas with sufficient containment measures to avoid exposure to stormwater.

#### **4.1.2 Spill Prevention and Response**

Refer to the two SPCC plans (one for the BSC and one for the three substations) and the BSC HWCP for details regarding the requirements, potential hazards identification, corresponding BMPs, as well as the

reporting and training procedures for oil and chemical spill prevention and response. The Oil and Chemical Spill Response and Contingency (Pepco Administrative Procedure EN-PP-0008) describes the response and cleanup procedures in an event of discharge of oil and other chemicals, and spills emanating from equipment at the Facility. General structural controls or procedures implemented at BSC to minimize the potential for leaks, spills, and other releases are summarized below:

- Containers that could be susceptible to spills or leaks are clearly labelled to encourage proper handling and facilitate rapid response. Containers are inspected monthly to ensure the containment structures have no leaks, cracks, or corrosion problems, and that the outlets are properly sealed.
- Preventive measures such as enclosure/cover, berms and secondary containment are used for transformer processing, material storage areas, loading and unloading, and T&D operations at substations to minimize the exposure to stormwater runoff. Rainwater is drained from berm areas or containment structures only after careful inspection by trained personnel. If no sheen, color, foam, visible stains, floating solids, or suspended solids are evident in collected rainwater, the water is manually removed from the containment areas using a portable pump and discharged to the storm drain system. Otherwise, rainwater accumulated in the berm areas or containment structures will be collected, sampled, and disposed off-site at a certified facility as appropriate.
- Emergency response procedures are identified in the SPCC plans, including spill response procedures, immediate removal actions, and follow-up corrective actions.
- Cleanup activities of spills occurring within containment structures typically involve using a product recovery pump followed by application of appropriate absorbent materials. Cleaning operations are carried out in berm areas that prevent runoff and ensure that wash water does not flow to storm drains.
- In addition to the preventive measures, active containment measures will be implemented in the event of a spill. Temporary dams consisting of sandbags, bales, or soil can be constructed across ditches outside the BSC perimeter to prevent further migration. Additional short-term containment can be provided by temporary berms and sorbents. Applying sand to small spill areas can be helpful in preventing further oil migration. Prompt cleanup of a spill will be performed to avoid subsequent spreading of the oil. Absorbent booms will be used to prevent stormwater from transporting oil away from the spill location. Appropriate measures will be taken to prevent and control downstream migration of any spilled oil. If oil reaches navigable waters or adjoining shorelines (Anacostia River), temporary containment measures including use of booms, straw skimmers, bales, dikes, and sorbents will be implemented. Selection of appropriate measures for a given site depends on type and size of the navigable water or shoreline, flow rate, size of spill, and factors related to weather conditions at the time the spill occurred. In fast-moving rivers, booms can be placed along the outer edge of meanders where currents will direct oil toward the boom. The angle of the boom to the bank will be selected based on the current velocity.
- Pepco has identified spill response contractors for tank cleaning, spill containment, equipment cleanup, waste oil removal, and vacuum pumping. The contractors include Miller Environmental, HydroChemPSC, and ACV Enviro.
- Spill kits are stationed at various locations throughout the facility and are inspected monthly.

#### **4.1.3 Erosion and Sediment Controls**

All pervious areas on site are either filled with an infiltration layer of stone/gravel (such as the former generating station area and the former cooling tower area), developed as low impact development (LID) areas with vegetation (such as landscaping islands, and bioretention areas) or are stabilized to eliminate exposed soil at the facility. Refer to Figure B-2 or Figure B-3 in Attachment B for the locations of the BMPs.

- Areas layered with gravel/stone include the former cooling tower area, substations, various waste management areas such as the salvage yard, water treatment and frac tank area, oil/water separator area, etc.
- Several LID areas (LID-4A, LID-4B, and LID-4C) were constructed between the parking lot areas (FM-3 and FM-7).
- Bio-retention ponds were constructed in the former cooling tower area (DP-1 and DP-2), and in the area to the north of the fueling station (SWP-1 and SWP-2)
- A Pollinator garden was built at the northwest of Building 56 (PG-2).
- Rip-rap is installed at the entrance of the bioretention area by the fueling station to reduce runoff velocity and minimize soil erosion.
- Bioretention areas are regularly inspected for soil erosion.
- Construction activities are managed under E&SC plans dependent on the size of the construction area

A bio-log is installed in the construction material storage area (EO-6) adjacent to the Foote Street gate. Hay bales are used around the soils staging areas (EO-5) as erosion control devices for the soil pile.

Various control measures are used to remove sediment from stormwater runoff before discharging at outfalls. The control measures include sediment filters installed at every outdoor storm drain inlet, stormwater treatment system design for sediment removal, annual inspection and cleaning of the storm drain system, and the bioretention areas constructed to retain and infiltrate stormwater runoff. These control measures are discussed in detail in Section 4.1.4.

No significant area of erosion that requires stabilization is identified at the BSC. If in the future any area exhibits significant soil erosion, or any earth disturbance activities occur, the impacted areas will be stabilized and protected in accordance to the Erosion and Sediment Control Manual developed by the District Department of Energy and Environment. In the District of Columbia, a Soil Erosion and Sediment Control Plan is required as part of the building permit process for construction and redevelopment projects that clear, grade, or in any way disturb the earth's surface.

#### **4.1.4 Management of Runoff**

Stormwater runoff from the Facility is conveyed through underground drain systems either directly to the Anacostia River at Outfall 013 or to the District's MS4. Refer to Figure B-3 in Attachment B for the locations of BMPs discussed in this section.

##### **Storm Drain Inlet Controls**

Stormwater runoff enters the storm drain system through various inlets and catch basins located throughout the site. Every storm drain inlet and catch basin at the facility is fitted with a sediment filter and/or a metal absorbing device for removal of TSS and dissolved metals. The control devices utilized for the storm drain inlet controls include Ultra-Drain Guard®, Ultra-Curb Guard Plus®, and Ultra-Filter Socks®.

The Ultra-Drain Guard® is a specialized catch basin insert that has quilted sections sewn into the body of the unit where stormwater flows through. A custom blend of heavy metal removal media is contained in each section. A non-permeable, PVC skirt at the top of the unit funnels all water to the lower portion of the Ultra-Drain Guard® where it is forced to move through the media before it can move on into the storm drain. This BMP removes hydrocarbons, heavy metals, sediment, and other organics from stormwater runoff.

The Ultra-Curb Guard Plus® protects curb inlets from sediment-laden stormwater runoff. The wedge-shaped, heavy-duty foam secures the unit in curb inlet, while multiple units can be quickly and easily connected to form longer lengths. The woven, polypropylene material provides high flow rate for the stormwater passing through the units before it gets into the storm drain system.

The Ultra-Filter Socks® are used in front of, or around the storm drain inlets/catch basins for sediment and heavy metal removal. The woven polymer casing allows water to pass through quickly while filtration media removes pollutants. Different types of media are available depending on which pollutant is targeted for removal.

The Abtech treatment devices are used at various locations on site. The Ultra-Urban® Filter (UUF) Chester series is a passive, flow-through, stainless-steel, stormwater filtration, and purification system designed as an insert sleeve for catch basins. There are two types of models: the UUF "Drop-In" (UUF DI) and the UUF "Curb Opening" (UUF CO).

The unit utilizes a filter screen with orifices of less than 5mm in size to reduce trash, debris, and sediment. In addition to TSS reduction, each filter uses AbTech's Smart Sponge® media in the filter enclosure to reduce both particulate and dissolved contaminants.

The Filtrix Stormexx treatment devices are also used at various inlet on-site. The Stormexx units contain a filtration cartridge designed for TSS and metals removal. The stainless steel frame and catch basin directs the water to the HDPE insert which contains the Stormexx filter media cartridge.

The specifications of these devices can be found in Attachment C. The devices are installed and maintained in accordance with the manufacturer's or supplier's specifications. Pepco has designated a dedicated contractor for routine inspection and maintenance of the inlet controls.

### Stormwater Treatment System

A stormwater treatment system was installed at the BSC in 2017 to treat stormwater runoff before discharging at Outfall 013. The water quality treatment measures for this project have been designed to reduce pollutant loads from a 1-inch storm event for stormwater runoff collected by on-site inlets and catch basins, which drain via the underground separate storm drain system and discharge at Outfall 013. Stormwater treatment is provided at the four Hotspots using combinations of Contech DownSpout StormFilter®, Jellyfish® Filter, and StormFilter® stormwater treatment systems. The Hotspot locations and treatment methods were determined based on facility-wide stormwater sampling performed in 2015 and 2016 and the resulting pollutant contamination loads. Refer to Figure B-2 in Attachment B for the Hotspot locations:

- Hotspot 1: transformer test shop area. Hotspot 1 is located in the southeast portion of the site. This location is chosen as the area contributes significant levels of zinc, in both total and dissolved forms, and copper to a lesser extent, but still high levels. Elevated concentrations of copper (total and dissolved), total iron, and zinc (total and dissolved) were frequently present in stormwater samples collected from runoff in this area. The treatment at Hotspot 1 consists of DownSpout StormFilter® units to treat runoff from the loading dock roof which sheds significant levels of zinc and copper, and



JellyFish® Filter units downstream of the DownSpout StormFilter® units for stormwater flows. The Combined flow is routed through a StormFilter® unit before discharging to the main storm drainpipe.

- Hotspot 2: salvage yard area. Hotspot 2 is located in a relatively central part of the site. This area is a contributor of elevated levels of total and dissolved copper as well as dissolved zinc. The treatment at Hotspot 2 consists of Jellyfish® Filter units for stormwater flows. Downstream of the Jellyfish® Filter unit are combined and routed through a StormFilter® unit for removal of the dissolved fraction prior to entering the main trunk line.
- Hotspot 3: former fuel tank area. Hotspot 3 is located near the former fuel tank area in a relatively central part of the site. This area is a contributor of all pollutants except for possibly the dissolved form of zinc. The percentage of site-wide total pollutant loading (total and dissolved) for which this sub-basin is responsible varies by metal of concern. The treatment at this location includes a Jellyfish® Filter followed by a combination of flows that are split in half with each half routed through a Jellyfish® Filter and StormFilter® combination unit arranged to remove TSS and related metals from the stormwater prior to entering the main trunk line.
- Hotspot 4: former power plant area. Hotspot 4 is located just east of the former power plant footprint in the northwestern portion of the site. This area contributes to high loading of both total and dissolved copper, iron, nickel, and TSS. The treatment at Hotspot 4 is a combination of Jellyfish® Filter and StormFilter® arranged to remove TSS and related metals from the stormwater prior to entering the main storm drainpipe.

DownSpout StormFilter® systems were installed at the existing loading dock roof downspouts on the west side of Building 56 to provide filtration of roof runoff with high concentrations of dissolved metals such as zinc, copper, and lead. This treatment measure is a passive, aboveground, pretreatment system that utilizes StormFilter® cartridges.

New inlets and manholes were constructed as part of the treatment system, and equipped with Jellyfish Filters® to collect and/or treat stormwater runoff from areas that are predominantly impervious, in both inline and offline configurations, in order to remove TSS, oil, and floatable trash from stormwater at pollutant source locations. This treatment measure is an underground, pretreatment system that utilizes membrane filtration cartridges.

StormFilter® stormwater treatment devices include large underground concrete vaults that house a large number of rechargeable self-cleaning, media-filled cartridges that trap particulates and absorb pollutants such as dissolved metals, hydrocarbons, nutrients, metals, and other common pollutants found in stormwater runoff. The filter media in the StormFilter® cartridges are customized at each hotspot to target site-specific pollutants. This treatment measure is the primary water quality treatment technology at each of the Hotspot locations.

Details on the stormwater treatment system can be found in Attachment C.

#### Oil/Water Separator

Located to the south of Building 75, the OWS consists of two 7,000-gallon open topped concrete holding tanks and a gravel area for staging drums. Manhole oil/water mixture is brought in from both onsite and offsite locations and is processed through the holding tanks. Oil is skimmed and accumulated in a 950-gallon underground vault, which is inspected after processing. Used skimmer filters and debris are stored in drums in a gravel area surrounding the oil/water separator concrete tanks. Water accumulated in the holding tank is sampled for analysis and disposed of properly offsite.

### Frac Tanks and Water Treatment Trailer

Onsite and Offsite manhole water is transported by vac truck to the frac tank (closed-top) and water treatment area (EO-4). Decanted water from the vac trucks is pumped to the water treatment trailer for processing and then stored in the frac tanks. Accumulated water in the frac tanks is sampled monthly and directly discharged via dedicated pipeline to Blue Plains Advanced Wastewater Treatment Plant for treatment.

### Building 67 Bio-Planters

Four bio-planter filtration structures (B-1, B-2, B-3, and B-4) were installed by the eastern and western exists of Building 67 in December 2016. These biofiltration structures are designed to filter and retain stormwater runoff from the roof of Building 67.

### Water Quality Structures

Three underground units were constructed as oil & grit separators (WQS-1, WQS-2, WQS-4) for stormwater treatment before discharging to the storm drain system on site. WQS-1 is located next to the lift station to the west of substation 41. WQS-2 and WQS-4 are located to the north and south of Substation 7, respectively. Stormwater runoff and sheet flows from nearby road surface enter the structures, where solid sediment and any oil, if present, are retained in the treatment chambers. WQS-1 and WQS-4 discharge to Outfall 013, while WQS-2 discharges to Outfall 015, a MS4 outfall located at the northeastern edge of the property. WQS-3 and WQS-5 are StormFilter® structures that filter stormwater. WQS-3 is located in an employee parking area (FM-4) to the south of outdoor storage area WS-2. WQS-5 is installed above bio-planter B-1 at Building 67 and designed to treat stormwater from the roof before discharging to bio-planter-1.

No oil is expected to enter these structures under normal operations of BCS. The structures are inspected for maintenance once or twice a year, during which accumulated sediment and oil will be pumped out for offsite disposal.

### **4.1.5 Salt Storage Piles**

The salt storage pile at BSC is stored in Building 45 located near the northern boundary of the facility. Building 45 is a partially enclosed, covered, and three-sided structure. The area in front of Building 45 is graded to prevent runoff from getting into the building. Straw bales are placed in front of the building to keep salt from contacting stormwater runoff.

## **4.2 Non-structural BMPs**

### **4.2.1 Good Housekeeping**

Good housekeeping practices and procedures are non-structural BMPs that help maintain a clean and orderly work environment, which reduces the possibility of accidental spills caused by mishandling of materials or improper storage. Elements of good housekeeping apply to the operation and maintenance of industrial machinery and processes, material storage practices, material inventory controls, routine and regular cleanup schedules, and the organization of work areas. The facility uses good housekeeping BMPs in all outdoor and indoor areas. Good housekeeping practices are conducted regularly onsite, and the associated BMP inspections occur according to the inspection schedule discussed in Section 4.2.3.

- All materials are stored in designated areas in an orderly and appropriate manner.

- Containers are appropriately labeled.
- Floors, ground surfaces, and work areas are kept clean and dry.
- Materials and equipment stored temporarily at the salvage yard are hauled off-site frequently for scrap.
- Outdoor recycle bins are provided with lids/covers and are replaced with new ones when they become rusty. Lids or water-resistant covers are provided to the extent possible for outdoor scrap metal containers to reduce the potential risks of stormwater contamination.
- Drums are provided at the outdoor oil/water separator facility for debris and used skimmer filters removed from the skimmer. The drums are kept closed with lids and emptied when full.
- Hazardous waste is stored indoors in Building 68 with sufficient containment measures implemented. Waste is hauled off-site for appropriate disposal at least every 90 days and more frequently if needed. Refer to the Hazardous Waste Contingency Plan (HWCP) for the Benning Service Center for details regarding hazardous waste management.
- Eliminate or reduce emissions, effluents, and waste at the sources where possible.
- Procure environmentally preferable products.
- Conserve natural resources and energy whenever possible.
- Reuse and recycle materials whenever possible.
- Improve employee awareness of good housekeeping procedures.
- As a part of routine monthly inspection, the facility is inspected to identify any unneeded, used, or scrap equipment or materials that are exposed to stormwater. Such equipment or materials are removed from the facility or placed under cover. Examples of such equipment or materials include metal drums, cable reels, transformer protectors or other parts and metal skids.

#### **4.2.2 Preventive Maintenance**

Pepco performs preventive maintenance on equipment, facilities, and structural BMPs as needed to keep them in proper operating condition and avoid spills/leaks or pollutants. The preventive maintenance practices are considered non-structural BMPs and consisted of the inspection of equipment, operational systems, outdoor storage tanks, and stormwater control devices.

When equipment, facilities, or any structural BMPs need to be replaced or repaired, necessary repairs and modifications will be made as expeditiously as possible. In addition, non-structural control measures such as employee training and adequate spill response supplies/kits are maintained.

##### **Storm Drain System Maintenance**

The storm drain system at BSC is maintained in accordance with good engineering practices to minimize sediment buildup in the lines, ensure proper flows, and maintain the structural integrity of the system. At least once per year, the system is inspected by a qualified contractor using closed circuit television (CCTV) or other appropriate technology. In conjunction with the inspection, damaged lines are scheduled for repair and/or replacement as needed.

#### Storm Drain Inlet Control BMPs Maintenance

The filter cloth control BMPs (refer to Section 4.1.4 for BMP details) installed at every outdoor storm drain inlet/catch basin are inspected weekly and cleaned, adjusted, or replaced as necessary, in accordance with the manufacturer's or supplier's specifications. A backup supply of inlet controls, including any custom-fitted filters or booms, is maintained at the facility so that needed replacements can be made within 48 hours.

#### Abtech / Stormexx Control BMPs Maintenance

These treatment devices are inspected weekly and maintenance of these units is site specific dependent on pollutant loading. The current maintenance schedule is maintained on the BSC Stormwater Teams® Site.

#### Stormwater Treatment System Maintenance

Stormwater treatment systems were installed at four locations identified to be the hotspots for contribution of metals to stormwater runoff before discharging at Outfall 013. The treatment systems consist of suspended solids removal and metal removal systems. Details on the treatment system, maintenance schedule and practices are discussed in Section 4.1.4 and in Attachment C.

#### Bioretention Facility Maintenance

Four stormwater bioretention ponds were installed at the BSC. Two of the ponds are located at the former cooling tower areas (DP-1 and DP-2) and the other two at the fueling station (SWP-1 and SWP-2), respectively. These bioretention areas are designed to filter and retain stormwater runoff before conveying the stormwater to the storm drain system and discharging at Outfall 013. The maintenance schedule for the bioretention areas is summarized in the table 4-1 on page 38.



<b>Table 4-1: Schedule for Bioretention Facility Maintenance (SWMPs 5114 and 5529)</b>			
<b>Description</b>	<b>Method</b>	<b>Frequency</b>	<b>Time of the Year</b>
Conduct maintenance inspection	Visual	Annually	Typically Spring
Inspect for soil and erosion after severe storm events	Visual	When needed	When needed
Conduct riser inspections	Visual	At least once per year	At least 72 hrs after last storm runoff event
Re-mulch any void areas	By hand	When needed	When needed
Remove previous mulch layer before applying new layer (optional)	By hand	As required, every two to three years	Spring
Remove and replace dead and diseased vegetation, weed, and rake mulch	By hand	Twice per year	March 15 to April 30 and October 1 to November 30
Mow grass filter strip	Mechanical	Typically three to four times per year	April through October
Treat all diseased trees and shrubs and add reinforcement planning to maintain vegetation density	Mechanical or by hand	When needed	When needed
Watering of new plant material at the end of each day for 14 consecutive days after planting is completed	By hand	Immediately after completion of planting	When needed

#### Building 67 Bio-Planter Maintenance

Four bio-planter filtration structures (B-1, B-2, B-3, and B-4) were installed by the eastern and western exists of Building 67 in December 2016. These biofiltration structures are designed to filter and retain stormwater runoff from the roof of Building 67 before conveying the stormwater to the storm drain system and discharging at Outfall 013. The maintenance schedule for the bio-planter areas is summarized in the table 4-2 on page 39.

<b>Table 4-2: Schedule for Building 67 Bio-Planter Maintenance (SWMP 5350)</b>			
<b>Description</b>	<b>Method</b>	<b>Frequency</b>	<b>Time of the Year</b>
Remove weeds; check inlets for accumulated leaves and debris that block inflow	By hand	Three to four times per year	Typically summer and fall
Conduct a maintenance inspection, supplement mulch in devoid areas to maintain a 3 inch layer, prune vegetation, remove sediment in inflow points	Visual By hand	Annually	Typically in May
Remove and replace the mulch layer	Mechanical	Once every 2-3 years	When needed
Add reinforcement planting, remove invasive plants, remove any dead or diseased plants, stabilize the contributing drainage area to prevent erosion	Mechanical	When needed	When needed
Look for any damage and repair as needed	Visual	After severe storm events	When needed
Inspect riser pipes and look for any damage and repair as needed	Visual	At least once per year	When needed

#### Oil-filled Equipment, Containers, and Tanks Maintenance

Oil-filled equipment, containers, and storage tanks containing 55 gallons or more are visually inspected as detailed in the SPCC plans for leaks and evidence of malfunction or deterioration. Gaskets, valves, pumps, exposed piping, and fittings are periodically checked for signs of wear, stains, or drips. In the event that a deficiency is observed, the corrective action activity is detailed on the inspection form. Care is taken during repairs and equipment testing to prevent spills. Any wastes are safely containerized and disposed of according to applicable State and Federal regulations.

#### Spill Response Kits Maintenance

Spill kits are stationed at various locations throughout the facility, including Building 57, Building 88, T&D Holding area, fueling station area, Building 68, and the salvage yard. Spill equipment supplies are inspected monthly as part of the monthly site wide inspection.

### **4.2.3 Inspections**

The facility inspection program at BSC evaluates the adequacy and condition of existing control measures. Pepco documents the findings of the inspections and maintains the inspections forms/reports with this SWPPP and BMP plan.

Due to the complexity of the site, various routine inspections are described as follows.

### Weekly Storm Drain Inlets/Catch Basins Inspection

On a weekly basis each storm drain inlet/catch basin control is inspected for sediment and pollutant accumulation, proper placement, structural condition, and general effectiveness. During inspection, any accumulated sediment is removed from the inlet controls and any controls that are damaged or no longer functional are replaced within 48 hours. Storm drain inlet controls are replaced at the end of their service lives as recommended by the vendor specifications. If inspections show that the inlet control in a particular location is underperforming, Pepco will replace it with a heavier duty or more effective control device. Refer to the Attachment C for details on control devices. The inspections are conducted by one or more dedicated contractors, member(s) of the stormwater pollution prevention team/BMP Committee, or a designee. The weekly inspection form is provided in the Attachment D.

In addition to the weekly inspection, a drive-by inspection of storm drain inlets will be conducted following a precipitation event that exceeds 0.5 inch as measured by the rain gauge at the facility. This practice helps the controls function properly. The drive-by inspection may be conducted by a single person. Inspections will be documented using the inspection form in Attachment D, noting any corrective actions performed during the inspection or requiring follow up.

Following the completion of the weekly inspection, necessary corrective actions identified during the inspection are documented in the inspection form, which is reviewed and signed monthly by a member of the stormwater pollution prevention team/BMP Committee.

### Monthly Site-Wide Inspection (Documented)

A monthly inspection is completed to assess the overall site conditions, evaluate the adequacy of existing site control measures, and identify issues that need to be addressed. The inspections are conducted by one or more dedicated contractors, member(s) of the stormwater pollution prevention team/BMP Committee, or a designee. All areas are inspected by corresponding managing departments identified in Section 3.2.

Control measures information can be found in Section 4.1. The inspection is documented using the site wide monthly inspection forms provided in Attachment D. The monthly site wide inspection forms include inspection conducted for areas identified in Section 3.2.

### Stormwater Treatment System Inspection

Inspection is conducted twice a year at a minimum to assess the adequacy of the stormwater treatment system installed in the storm drain system and identify issues that need to be addressed. The inspections are conducted by a dedicated contractor. An inspection report is provided by the contractor upon completion.

### Annual Storm Drain System Inspection

An annual inspection of the storm drain system is conducted using CCTV or other appropriate measures. The inspection is conducted by a qualified contractor and identifies areas of pollutant buildup or structural defects. An inspection report is provided by the contractor documenting the inspection results.

Following the completion of the inspection, sediment or other pollutant buildup will be removed as necessary. If structural repairs are necessary, Pepco will engage a contractor to implement such repairs. Documentation of the repairs will be submitted to EPA in the quarterly NPDES consent decree report.

### Annual Operations and Maintenance Certification

Pepco shall certify at least annually that the previous year's inspections and maintenance activities were conducted, results were recorded, records were maintained, and that the facility is in compliance with this SWPPP and BMP plan. If the facility is not in compliance with any aspect of the plan, the annual certification shall state the non-compliance and the remedies which are being undertaken. Such annual certifications also shall be signed in accordance with the requirements identified in 40 Code of Federal Regulations (CFR) §122.22. Pepco shall keep a copy of the current and all previous certifications (the initial certification, recertifications, and annual certifications) signed during the effective period of this permit at the Facility and shall make it available for inspection by the EPA or DOEE.

### **4.2.4 Monitoring**

As required by the NPDES permit, Pepco performs quarterly stormwater sampling required by the current NPDES permit to monitor stormwater discharges at Outfall 013.

Per the NPDES permit requirements, stormwater sampling is conducted at Outfall 013 following these criteria:

- Samples are collected from the discharge resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch) storm event.
- Samples are taken quarterly during the periods of January through March, April through June, July through September, and October through December.
- The grab samples are taken during the first 30 minutes of the discharge. If the collection of a sample during the first 30 minutes is impracticable, a sample will be taken during the first hour of the discharge, and Pepco will submit with the monitoring report a description of why a sample during the first 30 minutes was impracticable.

Stormwater sampling protocol is outlined in the Storm Water Sampling Handbook. The sampling, handling, and shipping procedures discussed in the handbook document are applicable to the stormwater monitoring at the BSC.

The NPDES permit specifies daily maximum effluent limitations for pH, TSS, oil and grease, total copper, total iron, total zinc, total PCBs, total nitrogen, and total phosphorus, and benchmark monitoring requirements for total cadmium, total lead, and total nickel. A modeling study to quantify the dilution of the discharges at Outfall 013 to the Anacostia River was submitted to EPA, as specified in Part III Section C of the May 2022 NPDES permit. Refer to the NPDES permit in Attachment A for details on the monitoring and reporting requirements.

The majority of stormwater runoff from the facility is conveyed through a reinforced concrete pipe trunk line to the Anacostia River via Outfall 013. As Outfall 013 is located off-site, the permit allows stormwater samples to be collected from MH33. This manhole is the most downstream and on-site manholes that are located upstream of the outfall.

The total volume and rate of the discharge during a storm event along is estimated. The time since the last quantifying rain event is also tracked

Monitoring data is submitted on Discharge Monitoring Report Forms postmarked no later than 28<sup>th</sup> of the month. A separate Discharge Monitoring Report Form is required for each outfall. Certified copies of the



Discharge Monitoring Report are submitted to the EPA Regional Administrator and the District of Columbia electronically via NetDMR.

As required by the 2017 Consent Decree, performance monitoring of the stormwater treatment system is conducted biannually and reported separately to EPA.

#### **4.2.5 Spill Reporting**

The On-Scene Coordinator is responsible for ensuring that all appropriate agencies are notified in the event of a spill. In general, when reporting a spill to an outside agency, the following information is required:

- The exact address or location and phone number of the facility
- The date and time of the discharge
- The type of material discharged
- Estimates of the total quantity discharged
- The source of the discharge
- A description of all affected media
- The cause of the discharge
- Any damages or injuries caused by the discharge
- Actions being used to stop, remove, and lessen the effects of the discharge
- Whether an evacuation may be needed
- The names of individuals and/or organizations who have also been contacted

##### **4.2.5.1 District of Columbia Reporting**

An oil discharge  $\geq 25$  gallons or any oil discharge to water should be immediately (less than 2 hours) reported to the DC Emergency Operations Center (EOC) of the Homeland Security & Emergency Management Agency (HSEMA) (formerly the DC Mayor's Command Center) @ 202-727-6161. The DC EOC will forward the spill information to the District Department of Energy and the Environment (DOEE).

If DOEE requests a written report, the On-Scene Coordinator must contact the Regional Environmental Compliance Specialist immediately. The Regional Environmental Compliance Specialist must complete this report (with the On-Scene Coordinator's input, if necessary) and forward it to DOEE at the following address by the requested date:

DC Department of Energy and Environment  
1200 First St NE  
Washington, DC 20002

##### **4.2.5.2 Federal Reporting**

###### National Response Center Spill Reporting

In the case of an oil release to a waterway, the On-Scene Coordinator, with assistance from the Regional Environmental Compliance Specialist, shall immediately notify the National Response Center (NRC) @ 1-800-424-8802.

In the case of an oil release more than 1,000 gallons; or two reportable spills greater than 42 gallons within the last twelve months, a written report (see 40 CFR 112.4(a) for report details) shall be submitted to the EPA Region III office within 60 days.

### EPA Spill Reporting

If a report is required in response to a spill or spills as described above, the report will be prepared by the Regional Environmental Compliance Specialist and submitted to the EPA Regional Office and to DOEE – see addresses below.

U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

DC Department of Energy and Environment  
1200 First St, NE  
Washington, DC 20002

### Internal Spill Reporting

The On-Scene Coordinator is required to submit a written Spill Report to the Regional Environmental Compliance Specialist, and distribute copies as necessary, for any spill or release. The report is to be prepared and submitted within 5 days of the incident. The On-Scene Coordinator may request the assistance of the Regional Environmental Compliance Specialist in the investigation.

### PCB Spill Reporting

The 2017 NPDES Consent Decree requires that any spill or release of PCBs outside secondary containment at the facility be reported to EPA within 24 hour and in writing within five days of the spill.

## **4.2.6 Materials Compatibility**

Incompatibility of materials can cause equipment failure resulting from corrosion, fire, or explosion. This can be prevented by ensuring that the materials of construction for containers handling hazardous substances or toxic pollutants are compatible with the container's contents and surrounding environment. Materials compatibility encompasses three aspects: compatibility of the chemicals being handled with the materials of construction of the container, compatibility of different chemicals upon mixing in a container, and compatibility of the container with its environment.

Materials and chemicals at the Facility are stored in separate containers until their use. The containers have been approved for the transport and storage of each chemical, and have the appropriate materials, construction, and coatings to prevent corrosion, degradation, or other destruction of the containers by the chemicals involved. No chemical mixing is expected in regular operations at the BSC. No experimental mixing or testing is involved. Refer to the Pepco Hazardous Waste Management Procedure for details.

## **4.2.7 Site Security**

Pepco implements access controls to prevent accidental or intentional entry to the Facility that might result in vandalism, theft, sabotage or other activities that could possibly cause a release of hazardous materials. The Facility is completely fenced. There is 24-hour manned security at the (34th Street) Main Gate entrance. The Foote Street gate operational hours are from 0600 to 1700 hours and the gate provides a single access lane for entry. The egress entrance to Foote Street is secured and locked at all times. The

Kenilworth Avenue gate is permanently secured and closed. After hours, access to the Benning Service Center is through the 34th Street Main Gate.

Individuals entering the Facility must present their Pepco ID or contractor ID. This information and their employee ID number, vehicle number or registration, department, time and purpose of entering the property are recorded on the "Registration of Persons Entering Building Motor Vehicles" log. In addition, vehicle access gates located near the 230 kV switchyard accessing Foote Street, the northwest corner of the site, and the southwest side of the site near Building 32 remain locked at all times and are opened only by Pepco personnel with appropriate lock keys and/or combinations. Located underneath the elevated Metro transit tracks and adjacent to the 34th Street Main Gate, the overflow parking lot access gates are locked.

#### 4.2.8 Employee Training

Employee training is an integral part of successful implementation of this SWPPP and BMP plan. Training to ensure general stormwater awareness is provided to all employees and contractors whose activities may affect the quality of discharges at the site. The focus of the training program is to educate employees on recognition and prevention of various situations that may lead to contamination of stormwater discharges. More specific training is provided to members of the stormwater pollution prevention team and other employees and contractors whose job responsibilities include implementation of the Plan.

Details on the training program are listed in the table below.

<b>Table 4-4: Employee Training Schedule</b>		
<b>Content of Training</b>	<b>Frequency/Schedule</b>	<b>Personnel</b>
Overview of Stormwater Pollution Prevention	Orientation and Annually	Employees and contractors who work in areas where industrial materials or activities are exposed to stormwater
NPDES Permit review, SWPPP BMPs, Site Conditions, SWPPP Member duties and DOEE Inspection results	Annually	Stormwater pollution prevention team/BMP committee;

#### 4.2.9 Recordkeeping

Per EPA guidance, the following records are maintained as part of the SWPPP and BMP plan:

- Documentation of spills, leaks, and other discharges;
- Records of maintenance and inspections of the stormwater treatment system and structural BMPs.
- A copy of the current and all previous SWPPP certifications (the initial certification, recertifications, and annual certifications) signed during the effective period of the permit.

Review of these records enhances the effectiveness of the SWPPP and BMP plan and allows for early detection of potential problems.

Documentation regarding spills, leaks, and other discharges is kept in Attachment E. Records of maintenance and inspections of the stormwater treatment system and structural BMPs are kept in Attachment F. The records are maintained by the Corporate Environmental Group for a minimum of three years.

Spill incidents, response procedures, and documentation procedures at the Facility are listed in the SPCC plans. Specific inspection procedures for oil tank indicators, oil storage tanks, oil handling equipment, hazardous and non-hazardous waste containers, and tank trailers and trucks at the BSC are also outlined in the SPCC plans. The SPCC plans also contain inspection and maintenance logs. The stormwater pollution prevention team reviews the maintenance and inspection logs annually.



## SECTION 5: SWPPP CERTIFICATION

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 gathered and evaluated 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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Jamie Hill

Title: Sr. Mgr, Environmental Mgmt

Signature: *Jamie M. Hill*

Date: 7/31/2024

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## SECTION 6: PLAN MODIFICATIONS

In accordance with the EPA requirements, the stormwater pollution prevention team will update this SWPPP and BMP plan annually. The SWPPP and BMP plan will also be updated as necessary to reflect changes in the design, construction, operation, or maintenance of facilities at the BSC. In addition, the plan will be updated if directed by the EPA.

The components of the plan and the control measures and procedures implemented are evaluated annually. This process promotes an on-going commitment to evaluate potential pollution sources and existing measures and controls.

Modifications that have been made to the SWPPP are summarized in the table below.

<b>Table 6-1: SWPPP Modification Record</b>		
<b>Description of Modification</b>	<b>Date</b>	<b>Recorded By</b>
Initial Plan	July 1995	Pepco
Document revision	December 2010	Colin Danville
Document revision	June 2012	Colin Danville
Document revision	November 2013	Colin Danville
Document revision	September 2015	Colin Danville
Document revision	September 2016	Amec Foster Wheeler
Document revision	June 2017	Colin Danville
Update with new control measures	August 2019	Ghirmay Berhe
Document revision	January 2020	Hiedi Sturm
Revised based on 2021 NPDES permit	July 2021	Hiedi Sturm
Document revision with new contacts and BMPs	December 2022	Altan Erginkoc
2023 Annual update and split of SWPPP into two plans	July 2024	Ghirmay Berhe

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# **Stormwater Pollution Prevention and Best Management Practices Plan**

**for:**

Pepco Benning Service Center – West (BSC-West)  
3400 Benning Road NE  
Washington, D.C. 20019

## **SWPPP/BMP Contact(s):**

Pepco Holdings, Inc.  
Ghirmay Berhe  
3400 Benning Road NE  
Washington, DC 20019  
yalcin.erginkoc@exeloncorp.com

## **Plan Date:**

July 2024

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**ATTACHMENTS:**

**Attachment A – NPDES Industrial Permit**

**Attachment B – Plan Maps**

**Attachment C – Stormwater Treatment System O&M Manuals**

**Attachment D – Inspection Forms**

**Attachment E – Spills Recordkeeping**

**Attachment F – Stormwater Treatment System O&M Activities Records**

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## ACRONYMS

AST	Aboveground Storage Tank
BMP	Best Management Practice
BOD	Biochemical Oxygen Demand
BSC	Benning Service Center
CCTV	Closed Circuit Television
CFR	Code of Federal Regulations
DC	District of Columbia
DDD	Dichlorodiphenyldichloroethane
DDE	Dichlorodiphenyldichloroethylene
DDT	Dichlorodiphenyltrichloroethane
DOEE	Department of Energy and the Environment
E. coli	Escherichia Coli
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
HPFF	High-Pressure Fluid-Filled
HSEMA	Homeland Security & Emergency Management Agency
HWCP	Hazardous Waste Contingency Plan
NAD	the North American Datum
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
OWS	Oil/Water Separator
PAH	Polycyclic Aromatic Hydrocarbons
PCB	Polychlorinated Biphenyl
Pepco	the Potomac Electric Power Company
RCRA	Resource Conservation and Recovery Act
SWPPP	Stormwater Pollutant Prevention Plan
T&D	Transmission and Distribution
TMDL	Total Maximum Daily Load
TSCA	Toxic Substance Control Act
TSS	Total Suspended Solids
USGS	United States Geological Survey



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## SECTION 1: INTRODUCTION

The Potomac Electric Power Company (Pepco), a subsidiary of Exelon, maintains stormwater compliance for the Benning Service Center (BSC-West, or “the Facility”). The Facility (also referred to as Lot 800) is owned by Prologis and is currently in planning stages for redevelopment. The Facility discharges stormwater to the nearby Anacostia River under a National Pollutant Discharge Elimination System (NPDES) permit (No. DC0000094) issued by the U.S. Environmental Protection Agency (EPA).

### 1.1 Plan Purpose

In compliance with the provisions of the Clean Water Act, 33 U.S.C. §§ 1251 *et seq.*, as amended by the Water Quality Act of 1987, P.L. 100-4, Pepco is authorized to discharge from BSC-West to Anacostia River in accordance with discharge points, effluent limitation, monitoring requirements and other conditions set forth in the NPDES permit (No. DC0000094), which reissued in 2021. The reissued permit took effect on June 1, 2021, was subsequently modified on May 15, 2022 and expires on May 31, 2026. A copy of the May 15, 2022 NPDES Permit can be found in **Attachment A**.

As required by Section F in Special Conditions of the NPDES permit, a Stormwater Pollution Prevention Plan (SWPPP) shall be updated and signed by the permittee within 90 days after the effective date of the permit. The SWPPP is designed to reduce or prevent the discharge of pollutants in stormwater to the receiving waters and used as a tool to document the permittee’s compliance with the terms of the permit.

In addition, Section G in Special Conditions of the NPDES permit requires a Best Management Practice (BMP) plan be reviewed and updated to prevent or minimize the potential for the release of toxic substances from ancillary activities to the waters of the United States through plant site runoff, spillage or leaks, sludge or waste disposal, and drainage from raw material storage.

Pursuant to these requirements, this plan (“the Plan”) has been prepared as a combination of the SWPPP and the BMP plan. The Plan identifies potential sources of pollution that may reasonably be expected to affect the quality of the stormwater discharges and describes the BMPs implemented by BSC-West to prevent or minimize the potential for the release of toxic or hazardous pollutants to the waters of the United States. The Plan contains all the elements required by a SWPPP and a BMP plan listed in the NPDES permit.

In addition to the permit requirements, this plan also addresses the BMP monitoring and reporting requirements set forth in the Consent Decree signed between Environmental Protection Agency (EPA) and Pepco and entered by the U.S. District Court of the District of Columbia on May 19, 2017..

### 1.2 Plan Organization

This plan is organized as presented in **Table 1-1**, with supplementary information in the Appendices. Sections that are applicable to the requirements of the SWPPP and BMPs plan are also indicated in the table.

<b>Table 1-1: Plan Organization</b>		
<b>Report Sections</b>	<b>SWPPP</b>	<b>BMPs Plan</b>
Section 1: Purpose, Organization, and Implementation of the SWPPP and BMPs plan	✓	✓
Section 2: General Site Information	✓	✓
Section 3: Potential Pollutant Sources	✓	✓
Section 4: Facility-Wide Best Management Practices	✓	✓
Section 5: SWPPP Certification	✓	
Section 6: Plan Modification	✓	✓

### 1.3 Plan Oversight and Implementation

This Plan is overseen and implemented by Pepco Environmental Services, in coordination with Prologis, under the overall oversight by the supervisor of Environmental Services department who has the overall responsibility for the successful implementation of the plan. Training requirements for personnel involved in the oversight and implementation process of the BMPs are discussed in Section 4.2.8.

### 1.4 Plan Certification, Review, and Amendment

This Plan is reviewed annually and modified whenever:

- A change in design, construction, operation, or maintenance, which has a significant effect on the potential for the discharge of pollutants to the waters of the United States.
- A release of a reportable quantify of pollutants as described in 40 CFR §302.
- A determination by Pepco or EPA that the plan appears to be ineffective in achieving the general objectives of controlling pollutants in stormwater discharges from the Facility.
- Changes at BSC-West materially increase the potential for significant releases of toxic or hazardous pollutants.

Pepco shall amend and update this Plan within 14 days following any significant changes at the Facility affecting the Plan. Any significant changes in amended or new versions of the SWPPP and BMPs plan shall be re-certified by Pepco. Such re-certifications also shall be signed in accordance with the requirements identified in 40 CFR §122.22. The Plan certifications are presented in Section 5.

## **1.5 Plan Availability and Distribution**

A hard copy of the Plan will be maintained by a representative who manages the implementation of the plan from the Environmental Services department and will be available for inspection by designated representatives of the EPA and other authorized government agencies.



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## SECTION 2: GENERAL SITE INFORMATION

Occupying approximately 10 acres, the Facility was the former location of the Benning Power Plant that was removed in 2015. This section provides general site information required by a SWPPP and a BMP plan.

### 2.1 Facility Information

#### Facility Information

Name of Facility: Pepco Benning Service Center

Street: 3400 Benning Road, NE

City: Washington, D.C.

ZIP Code: 20019

NPDES ID: DC0000094

#### Latitude/Longitude

Latitude:

38.897 ° N

Longitude:

-76. 959 ° W

#### Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale: 1:24000)

☒ GPS

☐ Other (please specify):

---

#### Horizontal Reference Datum (check one):

☐ NAD 27

☒ NAD 83

☐ WGS 84

Is the facility located in Indian country?

☐ Yes

☒ No

Are you considered a "federal operator" of the facility?

**Federal Operator** – an entity that meets the definition of "operator" in this permit and is either any department, agency or instrumentality of the executive, legislative and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.

☐ Yes

☒ No

Estimated area of industrial activity at site exposed to stormwater: 6.67 acres

#### Discharge Information

Name(s) of surface water(s) that receive stormwater from your facility: Anacostia River

Does this facility discharge industrial stormwater directly into any segment of an "impaired water"?

☒ Yes

☐ No

If Yes, identify name of the impaired water(s) and segment(s), if applicable: Anacostia River

Identify the pollutant(s) causing the impairment(s):

- Biochemical oxygen demand (BOD);
- Escherichia coli (E. coli);
- Chlordane;
- Dichlorodiphenyldichloroethane (DDD);
- Dichlorodiphenyldichloroethylene (DDE);
- Dichlorodiphenyltrichloroethane (DDT);
- Dieldrin;
- Heptachlor Epoxide;
- Polycyclic aromatic hydrocarbons (PAH);
- Polychlorinated biphenyls (PCBs);
- Arsenic;
- Copper;
- Zinc;
- Total Suspended Solids (TSS);
- Oil and Grease;
- Nitrogen, Phosphorus; and
- Trash.

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?

TSS, Copper, Zinc, and PCBs

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? If yes, please list the TMDL pollutants:

- BOD;
- E. coli;
- Chlordane;
- DDD;
- DDE;
- DDT;
- Dieldrin;
- Heptachlor Epoxide;
- PAHs;
- PCBs;
- Arsenic;
- Copper;
- Zinc;
- TSS;
- Oil and Grease;
- Nitrogen;

- Phosphorus; and
- Trash.)

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water?   ☐ Yes       ☒ No

## 2.2 Contact Information/Responsible Parties

### Facility Operator/Owner:

Pepco Holdings LLC  
701 9<sup>th</sup> Street, NW  
Washington, DC 20068

### SWPPP & BMP Contact(s):

Primary:

Ghirmay Berhe  
3400 Benning Road NE  
Washington, DC 20019  
gberhe@pepco.com

Backup :

Lisa Thomas, Mgr. Environmental Services

## 2.3 Stormwater Pollution Prevention Team / BMP Committee

Each member of the Stormwater Pollution Prevention Team has ready access to the most updated copy of the facility SWPPP and other relevant documents. As one of the required elements of a BMPs plan, a BMP Committee is a group of individuals who are responsible for developing the BMPs plan and assisting the plant management in its implementations, maintenance and updating. Thus, the Stormwater Pollution Prevention Team can also serve as the BMP Committee. In this plan, the Stormwater Pollution Prevention Team and the BMP Committee refer to the same group of members listed in the table below.



<b>Table 2-1: Stormwater Pollution Prevention Team/BMP Committee</b>	
<b>Staff Names</b>	<b>Responsibilities</b>
Jamie Hill, Manager Environmental Management	Authorized signatory authority for SWPPP certification and future annual reports. Certifying at least annually that the previous year's inspections and maintenance activities were conducted, results were recorded, records were maintained, and that the facility is in compliance with the plan.
Ghirmay Berhe, Senior Engineer, Environmental Services	Implementing and maintaining the program for SWPPP and BMP plan development and updates;
Supervisor or Supervisor's Designee from the following department:	Reporting spills as required, coordinating clean-up efforts, implementation of other applicable plans, monitoring stormwater as necessary, and completion of employee training needed. Responsible for inspections and maintenance.
Environmental Operations; Prologis	Assisting their department employees in awareness of the plan, BMPs, material management and assisting managers on other SWPPP duties.

## 2.4 Facility and Operations

The Facility consists of a rectangular drainage of approximately 6.7 acres in northeast Washington, D.C. It is bounded by Pepco's Benning Service Center - East to the east, Benning Road to the south and Anacostia Avenue to the west and north, with a portion of the site situated along the east bank of the Anacostia River just north of the Benning Road Bridge. See **Figure B-1** in **Attachment B** for the general site location map.

The facility is enclosed by a fence. Entry from Anacostia Avenue is via a locked gate. There is also an entrance from Benning Service Center – East. Entry from the Benning Service Center – East site requires entry from two guarded entrances that are monitored 24 hours per day, 7 days per week. The site housed a former electric generating station that was decommissioned in June 2012, demolished in May 2015. All structures associated with the former power plant. Thus, all discharges associated with the former power plant have been eliminated. Authorized discharges under the NPDES permit consist solely of stormwater. The current physical layout of the facility is presented in **Table 2-2** and **Figure B-3** in **Attachment B**.

Table 2-2: Facility Layout			
Areas			Managing Department
BSC-West	DA-01	West Drainage Area	Prologis
	DA-03	SE Drainage Area (Infiltration)	
	DA-04	NW Drainage Area (overflows to DA-01)	

The industrial activities that occur outdoors and could be potentially exposed to stormwater include:

- Equipment and materials storage, loading and unloading, and transportation in outdoor storage areas.

Stormwater runoff from the facility is conveyed through a storm drain system and is discharged to the Anacostia River. Stormwater from Drainage Areas (DA)-01 and DA-04 discharges to the Anacostia River at Outfall 101. Stormwater from Drainage Area DA-02 discharges to the Anacostia River at Outfall 013. Stormwater in DA-03 infiltrates to the subsurface. See **Figure B-2 in Attachment B** for the drainage areas and outfalls.

Pepco entered into a Consent Decree in 2017 to that requires certain control measures to achieve compliance with the NPDES permit with respect to discharges of metals and other pollutants from the facility into the Anacostia River. These measures include the operation of a treatment system at Inlet 87.

## 2.5 Environmental Policy

As a subsidiary of Exelon, Pepco shares Exelon's Environmental Policy (EN-AC-1, Revision 5), which present the "Policy Statement" as follows:

*Our ability to serve customers, create value for investors and contribute to our employees' and communities' shared expectations for the future directly depends on how well we manage our interactions with the environment. We are committed to sustaining our ecosystems and natural resources through pollution prevention and continually improving our environmental performance. We will:*

- *Promote a corporate culture in which we are accountable to our communities and the environment and in which full compliance with environmental laws and regulations is the minimum level of acceptable performance;*
- *Balance meeting future energy needs and contributing to economic growth with delivering sustainable solutions that are clean, affordable, reliable and provide customers the choices they expect; and*
- *Engage our stakeholders and our employees to preserve, restore and enhance habitats and biodiversity.*

As “Policy Intent”, Exelon shall:

- *Comply with all applicable environmental laws, regulations, and other commitments, with the objective of moving beyond compliance;*
- *Take a risk management approach to addressing the environmental impacts of our operations;*
- *Engage customers to develop and deliver innovative energy products and services that help them achieve their sustainability goals; and*
- *Actively seek relevant partnerships and publicly communicate our environmental performance.*

The policy is applicable to all Exelon companies and is implemented by maintaining and continuously improving a corporate-wide Environmental Management System conformant with the International Organization for Standardization 14001 Environmental Management System.

## **2.6 General Location Map**

The general location map for this facility is presented as **Figure B-1** in **Attachment B**.

## **2.7 Drainage Map**

The drainage map for this facility is presented as **Figure B-2** in **Attachment B**.

## **2.8 Site Map**

The site map for this facility is presented as **Figure B-3** in **Attachment B**.

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## SECTION 3: POTENTIAL POLLUTANT SOURCES

This Section describes potential pollutants associated with the industrial activities at BSC-West and their locations. All areas are identified and assessed for their potential to release hazardous contamination to the environment. Industrial materials or activities that are exposed to stormwater are also discussed.

### 3.1 Potential Pollutants Associated with Facility Activity

The table below lists the potential pollutants or pollutant constituents that are associated with the activities at the Facility identified in Section 2.4.

Table 3-1: Potential Pollutants Associated with Industrial Activities at BSC-West	
Industrial Activity	Potential Pollutants
Outside Storage Operations	Metals, suspended solids
Vehicle Parking	Gasoline, diesel fuel, engine oil, metals
Road Deicing	Salt

### 3.2 Risk Identification and Assessment

All areas associated with Pepco's NPDES permit have been assessed for their potential to release hazardous contamination to the environment. The potential pollutants for each area have been identified, as well as the BMPs in place to reduce or eliminate the potential for release.

#### 3.2.1 Drainage Areas 01, 02, and 04 (DA-01, DA-02, & DA-04)

DA-01, portions of DA-02 with the Facility boundary, and DA-04 are areas of the former power plant, service road, and storage building. This area may include materials, equipment, and supplies stored outside. Loading and unloading operations may occur in around this area along with vehicle and equipment traffic in these areas.

#### 3.2.2 Drainage Area 03 (DA-03)

DA-03 consists of the southern part of the site including areas of the former power plant, service road and pollinator garden. This area may include materials, equipment and supplies stored outside. Loading and unloading operations may occur in around this area along with vehicle and equipment traffic in these areas.

### 3.3 Inventory of Exposed Materials

The Facility discharges stormwater to Anacostia River through Outfalls 101 and 013. DA-01 discharges the majority of stormwater to the Anacostia River at Outfall 101. Stormwater from the portion of DA-02 within the Facility footprint discharges to Outfall 013. Stormwater associated with DA-04 predominately infiltrates

into the ground. Only during large storm events does DA-04 overflow to DA-01 and discharges via Outfall 101. Stormwater associated with DA-03 infiltrates into the ground. Currently, the Facility is in the planning stages for development and is largely inactive. Table 3-2 describes the areas and potential pollutants exposed to stormwater. Refer to Figure B-2 in Attachment B for drainage areas and outfall locations.

Table 3-2: Inventory of Exposed Materials of Potential Contamination		
Areas and Potentially Exposed Material	Description of Potential Exposure	Discharge Points that are likely to be affected
DA-01, DA02, & 04	Only exposure to stormwater if spills / leaks occur from equipment brought on site or equipment stored on-site.	Outfall 101; Outfall 013

No significant spills or leaks of oil, toxic or hazardous substances have occurred in the past three years in areas draining to a stormwater conveyance at the BSC-West.

## **SECTION 4: FACILITY-WIDE BEST MANAGEMENT PRACTICES**

This section includes both structural BMPs and non-structural BMPs that have been implemented at the BSC-West to comply with the requirements of SWPPP and BMP plans in the NPDES permit.

### **4.1 Structural BMPs**

#### **4.1.1 Minimize Exposure**

Preventing stormwater from coming into contact with potential pollution sources is generally more effective and less costly than removing pollutants from stormwater. Structural controls and procedures are implemented and maintained at BSC-West to minimize the exposure of industrial activities to rain, snow, snowmelt, and runoff. Industrial activities, such as vehicle maintenance, certain equipment and material storage, are to avoid exposure to stormwater. As needed, containment structures are implemented to prevent potential pollutants from contact with stormwater runoff.

#### **4.1.2 Spill Prevention and Response**

The Oil and Chemical Spill Response and Contingency (Pepco Administrative Procedure EN-PP-0008) describes the response and cleanup procedures in an event of discharge of oil and other chemicals, and spills emanating from equipment at the site. General structural controls or procedures implemented at BSC-West to minimize the potential for leaks, spills, and other releases are summarized below:

- Containers that could be susceptible to spills or leaks are clearly labelled to encourage proper handling and facilitate rapid response. Containers are inspected to ensure the containment structures have no leaks, cracks, or corrosion problems, and that the outlets are properly sealed.
- In addition to the preventive measures, active containment measures will be implemented in the event of a spill. Temporary dams consisting of sandbags, bales, or soil can be constructed across ditches outside the BSC-West perimeter to prevent further migration. Additional short-term containment can be provided by temporary berms and sorbents. Applying sand to small spill areas can be helpful in preventing further oil migration. Prompt cleanup of a spill will be performed to avoid subsequent spreading of the oil. Absorbent booms will be used to prevent stormwater from transporting oil away from the spill location. Appropriate measures will be taken to prevent and control downstream migration of any spilled oil. If oil reaches navigable waters or adjoining shorelines (Anacostia River), temporary containment measures including use of booms, straw skimmers, bales, dikes, and sorbents will be implemented. Selection of appropriate measures for a given site depends on type and size of the navigable water or shoreline, flow rate, size of spill, and factors related to weather conditions at the time the spill occurred. In fast-moving rivers, booms can be placed along the outer edge of meanders where currents will direct oil toward the boom. The angle of the boom to the bank will be selected based on the current velocity.
- Prologis has identified spill response contractors for tank cleaning, spill containment, equipment cleanup, waste oil removal, and vacuum pumping.
- As needed, spill kits are stationed at various locations throughout the facility.

#### **4.1.3 Erosion and Sediment Controls**

All pervious areas on site are either filled with an infiltration layer of stone/gravel (such as the former generating station area and the former cooling tower area) or are stabilized to eliminate exposed soil at the facility. Refer to Figure B-2 or Figure B-3 in Attachment B for the locations of the BMPs.

- Areas layered with gravel/stone include the former generating station area,
- Pollinator gardens were built at the southwestern corner of the Facility (PG-1)
- Construction activities are managed under E&SC plans dependent on the size of the construction area

Various control measures are used to remove sediment from stormwater runoff before discharging at outfalls. The control measures include metal removal booms and inlet sump installed at the storm drain inlet, stormwater treatment system design for sediment removal, annual inspection and cleaning of the storm drain system, and areas constructed to retain and infiltrate stormwater runoff. These control measures are discussed in detail in Section 4.1.4.

No significant area of erosion that requires stabilization is identified at the BSC-West. If in the future any area exhibits significant soil erosion, or any earth disturbance activities occur, the impacted areas will be stabilized and protected in accordance with the Erosion and Sediment Control Manual developed by the District Department of Energy and Environment. In the District of Columbia, a Soil Erosion and Sediment Control Plan is required as part of the building permit process for construction and redevelopment projects that clear, grade, or in any way disturb the earth's surface.

#### **4.1.4 Management of Runoff**

Stormwater runoff from the Facility is conveyed through a drain system and is discharged to the Anacostia River at Outfalls 101 and 013. Refer to Figure B-3 in Attachment B for the locations of BMPs discussed in this section.

##### Storm Drain Inlet Controls

Stormwater runoff enters the storm drain system through Inlet 87, Inlet 21 and Inlet 12. These drain inlet and catch basins are equipped with metal absorbing devices for removal of TSS and dissolved metals. The control devices utilized for the storm drain inlet controls include Ultra-Filter Socks®.

The Ultra-Filter Socks® are used in front of, or around the storm drain inlets/catch basins for sediment and heavy metal removal. The woven polymer casing allows water to pass through quickly while filtration media removes pollutants. Different types of media are available depending on which pollutant is targeted for removal.

##### Stormwater Treatment System

Stormwater collected at Inlet 87 is treated in an HFF unit prior to discharge to remove suspended solids and metals removal systems.

Details on the stormwater treatment system can be found in Attachment C.



## **4.2 Non-structural BMPs**

### **4.2.1 Good Housekeeping**

Good housekeeping practices and procedures are non-structural BMPs that help maintain a clean and orderly work environment, which reduces the possibility of accidental spills caused by mishandling of materials or improper storage. Elements of good housekeeping apply to the operation and maintenance of industrial machinery and processes, material storage practices, material inventory controls, routine and regular cleanup schedules, and the organization of work areas. Good housekeeping practices are conducted regularly onsite, and the associated BMP inspections occur according to the inspection schedule discussed in Section 4.2.3.

- All materials are stored in designated areas in an orderly and appropriate manner.
- Containers are appropriately labeled.
- 
- Improve employee awareness of good housekeeping procedures.
- As a part of routine monthly inspection, the facility is inspected to identify any unneeded, used, or scrap equipment or materials that are exposed to stormwater. Such equipment or materials are removed from the facility or placed under cover.

### **4.2.2 Preventive Maintenance**

Pepco provides preventive maintenance on structural BMPs as needed to keep them in proper operating condition. The preventive maintenance practices are considered non-structural BMPs.

When equipment, facilities, or any structural BMPs need to be replaced or repaired, necessary repairs and modifications will be made as expeditiously as possible. In addition, non-structural control measures such as employee training and adequate spill response supplies/kits are maintained.

#### Storm Drain System Maintenance

The storm drain system at BSC-West is maintained in accordance with good engineering practices to minimize sediment buildup in the lines, ensure proper flows, and maintain the structural integrity of the system. At least once per year, the system is inspected by a qualified contractor using closed circuit television (CCTV) or other appropriate technology.

#### Storm Drain Inlet Control BMPs Maintenance

The BMPs (refer to Section 4.1.4 for BMP details) installed at the storm drain inlet/catch basins are inspected weekly and cleaned, adjusted, or replaced as necessary, in accordance with the manufacturer's or supplier's specifications. A backup supply of inlet controls, including any custom-fitted filters or booms, is maintained at the facility so that needed replacements can be made within 48 hours.

#### Stormwater Treatment System Maintenance

A stormwater treatment system was installed at Inlet 87. Details on the treatment system, maintenance schedule and practices are discussed in Section 4.1.4 and in Attachment C.

### **4.2.3 Inspections**

The facility inspection program at BSC-West evaluates the adequacy and condition of existing control measures. Pepco documents the findings of the inspections and maintains the inspections forms/reports with this SWPPP and BMP plan.

The routine inspections are described as follows.

#### Weekly Storm Drain Inlets/Catch Basins Inspection

On a weekly basis each storm drain inlet/catch basin control is inspected for sediment and pollutant accumulation, proper placement, structural condition, and general effectiveness. During inspection, any accumulated sediment is removed from the inlet controls and any controls that are damaged or no longer functional are replaced within 48 hours. Storm drain inlet controls are replaced at the end of their service lives as recommended by the vendor specifications. If inspections show that the inlet control in a particular location is underperforming, Pepco will replace it with a heavier duty or more effective control device. Refer to the Attachment C for details on control devices. The inspections are conducted by one or more dedicated contractors, member(s) of the stormwater pollution prevention team/BMP Committee, or a designee. The weekly inspection form is provided in the Attachment D.

In addition to the weekly inspection, a drive-by inspection of storm drain inlets will be conducted following a precipitation event that exceeds 0.5 inch as measured by the rain gauge at the facility. This practice helps the controls function properly. The drive-by inspection may be conducted by a single person. Inspections will be documented using the inspection form in Attachment D, noting any corrective actions performed during the inspection or requiring follow up.

Following the completion of the weekly inspection, necessary corrective actions identified during the inspection are documented in the inspection form, which is reviewed and signed monthly by a member of the stormwater pollution prevention team/BMP Committee.

#### Monthly Site-Wide Inspection (Documented)

A monthly inspection is completed to assess the overall site conditions, evaluate the adequacy of existing site control measures, and identify issues that need to be addressed. The inspections are conducted by one or more dedicated contractors, member(s) of the stormwater pollution prevention team/BMP Committee, or a designee.

Control measures information can be found in Section 4.1. The inspection is documented using the site wide monthly inspection forms provided in Attachment D. The monthly site wide inspection forms include inspection conducted for areas identified in Section 3.2.

#### Stormwater Treatment System Inspection

Inspection is conducted twice a year at a minimum to assess the adequacy of the stormwater treatment system installed in the storm drain system and identify issues that need to be addressed. The inspections are conducted by one or more dedicated contractors, member(s) of the stormwater pollution prevention team/BMP Committee, or a designee. An inspection report is provided by the contractor upon completion.

#### Annual Storm Drain System Inspection

An annual inspection of the storm drain system is conducted using CCTV or other appropriate measures. The inspection is conducted by a qualified contractor and identifies areas of pollutant buildup or structural defects. An inspection report is provided by the contractor documenting the inspection results.

Following the completion of the inspection, sediment or other pollutant buildup will be removed as necessary. If structural repairs are necessary, Pepco will engage a contractor to implement such repairs. Documentation of the repairs will be maintained along with other documentation of actions to implement this SWPPP and BMP plan in Attachment F.

#### Annual Inspection Certification

Pepco shall certify at least annually that the previous year's inspections and maintenance activities were conducted, results were recorded, records were maintained, and that the facility is in compliance with this SWPPP and BMP plan. If the facility is not in compliance with any aspect of the plan, the annual certification shall state the non-compliance and the remedies which are being undertaken. Such annual certifications also shall be signed in accordance with the requirements identified in 40 Code of Federal Regulations (CFR) §122.22. Pepco shall keep a copy of the current and all previous certifications (the initial certification, recertifications, and annual certifications) signed during the effective period of this permit at the Facility and shall make it available for inspection by the EPA or DOEE.

#### **4.2.4 Monitoring**

As required by the NPDES permit, Pepco performs quarterly stormwater sampling required by the current NPDES permit to monitor stormwater discharges at Outfall 013 and Outfall 101.

Per the NPDES permit requirements, stormwater sampling is conducted following these criteria:

- Samples are collected from the discharge resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch) storm event.
- Samples are taken quarterly during the periods of January through March, April through June, July through September, and October through December.
- The grab samples are taken during the first 30 minutes of the discharge. If the collection of a sample during the first 30 minutes is impracticable, a sample will be taken during the first hour of the discharge, and Pepco will submit with the monitoring report a description of why a sample during the first 30 minutes was impracticable.

Stormwater sampling protocol is outlined in the Storm Water Sampling Handbook. The sampling, handling, and shipping procedures discussed in the handbook document are applicable to the stormwater monitoring at the BSC-West.

The NPDES permit specifies daily maximum effluent limitations for pH, TSS, oil and grease, total copper, total iron, total zinc, total PCBs, total nitrogen, and total phosphorus, and benchmark monitoring requirements for total cadmium, total lead, and total nickel. A modeling study to quantify the dilution of the discharges at Outfall 101 to the Anacostia River was submitted to EPA, as specified in Part III Section C in the May 2022 NPDES permit. Refer to the NPDES permit in Attachment A for details on the monitoring and reporting requirements.

The stormwater runoff from the Facility collected by Inlet 87 is treated and discharged to the Anacostia River via Outfall 101. As Outfall 101 is located off-site, the permit allows stormwater samples to be collected from the discharge of Inlet 87. This location is the most downstream and on-site manholes that

are located upstream of the outfalls. Stormwater collected in Inlets I-12 and I-21 is discharged to the Anacostia River at Outfall 013. Effluent samples for Outfall 013 are collected at Manhole 33, located on the BSC-East facility.

The total volume of the discharge during a storm event is estimated.

Monitoring data is submitted on Discharge Monitoring Report Forms postmarked no later than 28<sup>th</sup> of the month. A separate Discharge Monitoring Report Form is required for each outfall. Certified copies of the Discharge Monitoring Report are submitted to the EPA Regional Administrator and the District of Columbia electronically via NetDMR.

As required in the 2017 Consent Decree, performance monitoring of the stormwater treatment system is conducted biannually and reported separately to EPA.

#### **4.2.5 Spill Reporting**

The On-Scene Coordinator is responsible for ensuring that all appropriate agencies are notified in the event of a spill. In general, when reporting a spill to an outside agency, the following information is required:

- The exact address or location and phone number of the facility
- The date and time of the discharge
- The type of material discharged
- Estimates of the total quantity discharged
- The source of the discharge
- A description of all affected media
- The cause of the discharge
- Any damages or injuries caused by the discharge
- Actions being used to stop, remove, and lessen the effects of the discharge
- Whether an evacuation may be needed
- The names of individuals and/or organizations who have also been contacted

##### **4.2.5.1 District of Columbia Reporting**

An oil discharge  $\geq 25$  gallons or any oil discharge to water should be immediately (less than 2 hours) reported to the DC Emergency Operations Center (EOC) of the Homeland Security & Emergency Management Agency (HSEMA) (formerly the DC Mayor's Command Center) @ 202-727-6161. The DC EOC will forward the spill information to the District Department of Energy and the Environment (DOEE).

If DOEE requests a written report, the On-Scene Coordinator must contact the Regional Environmental Compliance Specialist immediately. The Regional Environmental Compliance Specialist must complete this report (with the On-Scene Coordinator's input, if necessary) and forward it to DOEE at the following address by the requested date:

DC Department of Energy and Environment  
1200 First St NE  
Washington, DC 20002

##### **4.2.5.2 Federal Reporting**

National Response Center Spill Reporting



In the case of an oil release to a waterway, the On-Scene Coordinator, with assistance from the Regional Environmental Compliance Specialist, shall immediately notify the National Response Center (NRC) @ 1-800-424-8802.

In the case of an oil release more than 1,000 gallons; or two reportable spills greater than 42 gallons within the last twelve months, a written report (see 40 CFR 112.4(a) for report details) shall be submitted to the EPA Region III office within 60 days.

#### EPA Spill Reporting

If a report is required in response to a spill or spills as described above, the report will be prepared by the Regional Environmental Compliance Specialist and submitted to the EPA Regional Office and to DOEE – see addresses below.

U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

DC Department of Energy and Environment  
1200 First St, NE  
Washington, DC 20002

#### Internal Spill Reporting

The On-Scene Coordinator is required to submit a written Spill Report to the Regional Environmental Compliance Specialist, and distribute copies as necessary, for any spill or release. The report is to be prepared and submitted within 5 days of the incident. The On-Scene Coordinator may request the assistance of the Regional Environmental Compliance Specialist in the investigation.

#### **4.2.6 Materials Compatibility**

Incompatibility of materials can cause equipment failure resulting from corrosion, fire, or explosion. This can be prevented by ensuring that the materials of construction for containers handling hazardous substances or toxic pollutants are compatible with the container's contents and surrounding environment. Materials compatibility encompasses three aspects: compatibility of the chemicals being handled with the materials of construction of the container, compatibility of different chemicals upon mixing in a container, and compatibility of the container with its environment.

Any materials and chemicals stored at the BSC-West are kept in separate containers until their use. The containers must be approved for the transport and storage of each chemical, and have the appropriate materials, construction, and coatings to prevent corrosion, degradation, or other destruction of the containers by the chemicals involved. No chemical mixing is expected in regular operations at the BSC-West. No experimental mixing or testing is involved.

#### **4.2.7 Site Security**

Pepco and Prologis implement access controls to prevent accidental or intentional entry to the Facility that might result in vandalism, theft, sabotage or other activities that could possibly cause a release of

hazardous materials. The BSC-West property is completely fenced. There is 24-hour manned security at the (34th Street) Main Gate entrance for entrance from BSC-East and access via Anacostia avenue is via locked gate.

Individuals entering the Facility from BSC-East must present their Pepco ID or contractor ID. This information and their employee ID number, vehicle number or registration, department, time and purpose of entering the property are recorded on the "Registration of Persons Entering Building Motor Vehicles" log.

#### 4.2.8 Employee Training

Employee training is an integral part of successful implementation of this SWPPP and BMP plan. Training to ensure general stormwater awareness is provided to all employees and contractors whose activities may affect the quality of discharges at the site. The focus of the training program is to educate employees on recognition and prevention of various situations that may lead to contamination of stormwater discharges. More specific training is provided to members of the stormwater pollution prevention team and other employees and contractors whose job responsibilities include implementation of the Plan.

Details on the training program are listed in the table below.

Table 4-4: Employee Training Schedule		
Content of Training	Frequency/Schedule	Personnel
Overview of Stormwater Pollution Prevention	Orientation and Annually	Employees and contractors who work in areas where industrial materials or activities are exposed to stormwater
NPDES Permit review, SWPPP BMPs, Site Conditions, SWPPP Member duties and DOEE Inspection results	Annually	Stormwater pollution prevention team/BMP committee.

#### 4.2.9 Recordkeeping

Per EPA guidance, the following written records are maintained as part of the SWPPP and BMP plan:

- Documentation of spills, leaks, and other discharges;
- Records of maintenance and inspections of the stormwater treatment system and structural BMPs.
- A copy of the current and all previous SWPPP certifications (the initial certification, recertifications, and annual certifications) signed during the effective period of the permit.

Review of these records enhances the effectiveness of the SWPPP and BMP plan and allows for early detection of potential problems.

Documentation regarding spills, leaks, and other discharges is kept in Attachment E. Records of maintenance and inspections of the stormwater treatment system and structural BMPs are kept in

Attachment F. The records are maintained by the Corporate Environmental Group for a minimum of three years.

Spill incidents, response procedures, and documentation procedures at the BSC-West are listed in the SWPPP plan.

## SECTION 5: SWPPP CERTIFICATION

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 gathered and evaluated 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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Jamie Hill,

Title: Sr Mgr, Environmental Mgmt

Signature: *Jamie M. Hill*

Date: 7/31/2024



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**SECTION 6: PLAN MODIFICATIONS**

In accordance with the EPA requirements, the stormwater pollution prevention team will update this SWPPP and BMP plan annually. The SWPPP and BMP plan will also be updated as necessary to reflect changes in the design, construction, operation, or maintenance of facilities at the BSC-West. In addition, the plan will be updated if directed by the EPA.

The components of the plan and the control measures and procedures implemented are evaluated annually. This process promotes an on-going commitment to evaluate potential pollution sources and existing measures and controls.

Modifications that have been made to the SWPPP are summarized in the table below.

Table 6-1: SWPPP Modification Record		
Description of Modification	Date	Recorded By
Initial Plan	July 2024	Ghirmay Berhe

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

Change in Management Responsibilities

The Principal Executive Officer has changed from Phillip Vavala to Jaclyn Cantler.

Ed Tracey has retired, and Michael Ratcliffe has taken over his duties (as a replacement for Gerry Hammel).

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

Status of Completion of the Transformer Storage Shed

The construction of the Transformer Storage Shed was completed by December 31, 2016, and the facility was placed in operation.



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

Status of Stormwater Retention Project

As reported in the 2018 4th 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.

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

Description of Non-Compliance(s)

There were no non-compliance events for the 3<sup>rd</sup> Quarter 2024.