

Via Electronic and US Mail - 7011 1150 0001 6024 3169

July 26, 2018

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

**Re: Benning Facility Consent Decree (Civil Action No. 1:15-cv-018450) - Quarterly
Status Reports for April - June 2018**

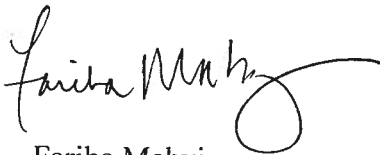
Dear Ms. Hopkins,

In accordance with Paragraph 68 of the Benning Facility Consent Decree, please find attached the following reports for the period of April - June 2018:

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

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

Sincerely,



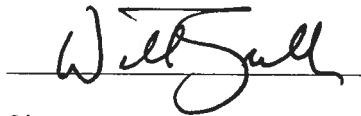
Fariba Mahvi
Sr. Project Manager
Environmental Services

CERTIFICATION STATEMENT

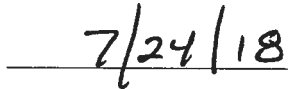
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage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

William Sullivan

Vice President, Electric and Gas Operations

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

Signature

A handwritten date "7/24/18" in black ink, written over a horizontal line.

Date

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

Discharge Monitoring Reports

Copies of DMRs for April - June 2018 are attached.

Permit

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

Permitted Feature: 003 - External Outfall

Report Dates & Status

Monitoring Period: From 04/01/18 to 04/30/18

Status: NetDMR Validated

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP, Operations

Major: ✓

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

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

Discharge: 003-A - OIL/WATER SEPARATOR

DMR Due Date: 05/28/18

Last Name: Sullivan

Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI:

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

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type	
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH											
1 - Effluent Gross		Smpl.				=7.29		=8.1	12 - SU	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended											
1 - Effluent Gross		Smpl.				=15		=15	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease											
1 - Effluent Gross		Smpl.				=11.2		=11.2	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39496	PCB-1242											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39504	PCB-1254											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39508	PCB-1260											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
50050	Flow, in conduit or thru treatment plant											
1 - Effluent Gross		Smpl.	=0.00342	=0.00342	03 - MGD		=0.00342	=0.00342	03 - MGD	0	01/DS - Once Per Discharge	MS - MEASRD
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		01/DS - Once Per Discharge	MS - MEASRD
NODI: -		NODI										

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-05-25 15:32 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-05-25 15:32 (Time Zone:-04:00)

©2008 NetDMR

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services
Facility: PEPCO - BENNING
Permitted Feature: 013 - External Outfall

Major:

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

Report Dates & Status

Monitoring Period: From 03/01/18 to 04/30/18
Status: NetDMR Validated

DMR Due Date: 05/28/18

Considerations for Form Completion**Principal Executive Officer**

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI:

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
50050	Flow, in conduit or thru treatment plant	Smpl.	=0.001	=0.0117	03 - MGD				0	01/60 - Once Every 2 Months	ES - ESTIMA
1 - Effluent Gross											
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					01/60 - Once Every 2 Months	ES - ESTIMA
NODI: -											
TS000	Toxicity, Acute	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				Opt Mon DAILY AV	Opt Mon DAILY MX	2F - tox acute		01/5Y - Once Every 5 Years	24 - COMP24
NODI: -											
						E - Analysis Not Conducted/No Sample	E - Analysis Not Conducted/No Sample				

Submission Note

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

Edit Check Errors

No errors.

Comments

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

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-05-25 17:52 (Time Zone: -04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-05-25 17:52 (Time Zone: -04:00)

Permit

Permit ID: DC0000094

Major: ✓

Permittee: PEPCO Environment Management Services

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

Facility: PEPCO - BENNING

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

Permitted Feature: 003 - External Outfall

Discharge: 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 05/01/18 to 05/31/18

DMR Due Date: 06/28/18

Status: **NetDMR Validated***Considerations for Form Completion*

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William

Last Name: Sullivan

Title: VP, Operations

Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH											
1 - Effluent Gross		Smpl.				=7.29		=8.1	12 - SU	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended											
1 - Effluent Gross		Smpl.				=15		=15	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease											
1 - Effluent Gross		Smpl.				=11.2		=11.2	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39496	PCB-1242											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39504	PCB-1254											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39508	PCB-1260											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
50050	Flow, in conduit or thru treatment plant											
1 - Effluent Gross		Smpl.	=0.0045	=0.0045	03 - MGD		=0.0045	=0.0045	03 - MGD		01/DS - Once Per Discharge	MS - MEASRD
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		01/DS - Once Per Discharge	MS - MEASRD
NODI: -		NODI										

Submission Note

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

Edit Check Errors

No errors.

*Comments**Attachments*

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-06-21 08:32 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-06-21 08:32 (Time Zone:-04:00)

6/20/2018 11:01 AM

Permit

Permit ID: DC0000094

Major: ✓

Permittee: PEPCO Environment Management Services

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

Facility: PEPCO - BENNING

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

Permitted Feature: 003 - External Outfall

Discharge: 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 06/01/18 to 06/30/18

DMR Due Date: 07/28/18

Status: **NetDMR Validated****Considerations for Form Completion**

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William

Last Name: Sullivan

Title: VP, Operations

Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

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

Submission Note

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

Edit Check Errors

No errors.

Comments

There was no discharge to internal monitoring point 003 during June 2018.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-07-13 16:59 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-07-13 16:59 (Time Zone:-04:00)

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Permit

Permit ID: DC0000094
 Permittee: PEPCO Environment Management Services
 Facility: PEPCO - BENNING
 Permitted Feature: 013 - External Outfall

Major:

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

Report Dates & Status

Monitoring Period: From 05/01/18 to 06/30/18
 Status: **NetDMR Validated**

DMR Due Date: 07/28/18

Considerations for Form Completion**Principal Executive Officer**

First Name: William
 Title: VP, Operations

Last Name: Sullivan
 Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
50050	Flow, in conduit or thru treatment plant	Smpl.	=0.00332	=0.02	03 - MGD				0	01/60 - Once Every 2 Months	
1 - Effluent Gross											
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					01/60 - Once Every 2 Months	ES - ESTIMA
NODI: -		NODI									
TS000	Toxicity, Acute	Smpl.									
1 - Effluent Gross											
Season: 0		Req.				Opt Mon DAILY AV	Opt Mon DAILY MX	2F - tox acute		01/SY - Once Every 5 Years	24 - COMP24
NODI: -		NODI				E - Analysis Not Conducted/No Sample	E - Analysis Not Conducted/No Sample				

Submission Note

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

Edit Check Errors

No errors.

Comments

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

Attachments

No attachments.

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 13:32 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 13:33 (Time Zone:-04:00)

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services

Facility: PEPCO - BENNING

Permitted Feature: 013 - External Outfall

Report Dates & Status

Monitoring Period: From 04/01/18 to 06/30/18

Status: **NetDMR Validated**

Considerations for Form Completion

NO BLOWDOWN

Principal Executive Officer

First Name: William
Title: VP, Operations

Major: ☒

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

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

Discharge: 013-Q - No Blowdown

DMR Due Date: 07/28/18

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: ☐

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

https://netdmr.ena.gov/netdmr/protected/sign_submit_dmr.htm?flowId=...

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

Submission Note

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

Edit Check Errors

Parameter Code	Name	Monitoring Location	Field	Type	Description	Acknowledge
01045	Iron, total [as Fe]	1 - Effluent Gross	Units	Soft	The selected units do not match the units specified by the permit for this parameter. (Error Code: 3)	✓
00530	Solids, total suspended	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	✓
01042	Copper, total [as Cu]	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	✓
01092	Zinc, total [as Zn]	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	✓

Comments

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

Attachments

Name	Type	Size
AttachmentsApril2018.pdf	pdf	84900

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 17:52 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 17:53 (Time Zone:-04:00)

Attachment 1

NPDES Permit DC 0000094

Permit Condition Part II. A

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

Outfall Number	Storm Event Monitoring Requirements			
	Sample Date	Duration of Storm Event (in hours)	Rainfall Measurement (in inches)	Duration Between Measurable Storm Events (in hours)
013	04/16/2018	13	1.54"	600
101	04/16/2018	13	1.54"	600

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction for April 16, 2018 Storm Event

Sampling Operating Station
Pollutant Load Fraction
Washington, DC

Output	Parameter	Sample Date	Concentration (mg/L) (A)	Average Flow (cfs) ^{1a}	Load (mg/s)	Maximum Daily Limit (mg/d) (C)	Maximum Daily Discharge Concentration (mg/L) (B)	Baseline Concentration (mg/L)	Source of Baseline Concentration ^{1b}	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ^{1c}	Pollutant Concentration Reduction Compared with Baseline Concentration ^{1d}	Pollutant Load Compared with Baseline Load ^{1e}
0130	TSS	4/16/2018	61	0.29	500.83	100	100	42	Highest TSS discharge concentration from DMR data for Oct-2010 TSS was not reported for Jul-Sep 2009. Flow was measured in October 2010.	4.82	5732	39%	45%	91%
0130	Cadmium	4/16/2018	<0.000350	0.29	0.011	0.00455	0.0045	0.00075	Highest cadmium discharge concentration from DMR data for Jul-Sep 2009.	7.46	0.16	100%	100%	100%
0130	Copper	4/16/2018	0.0068	0.29	0.06	0.01344	0.0134	0.064	Highest copper discharge concentration from DMR data for Jul-Sep 2009.	3.14	5.7	49%	69%	90%
0130	Iron	4/16/2018	0.6	0.29	4.83	1.00	NA	5.80	Highest iron discharge concentration from DMR data for Jul-Sep 2009.	0.146	24	40%	80%	80%
0130	Nickel	4/16/2018	0.0026	0.29	0.02	0.117 ^{1b}	0.117	0.056	Highest nickel discharge concentration from DMR data for Jul-Sep 2009.	0.146	0.23	96%	95%	91%
0130	Lead	4/16/2018	0.0125	0.29	0.10	0.06458	0.0645	0.023	Highest lead discharge concentration from DMR data for Jul-Sep 2009.	7.46	4.9	80%	45%	94%
0130	Zinc	4/16/2018	0.0745	0.29	0.6	0.11718	0.117	0.9	Highest zinc discharge concentration from DMR data for Jul-Sep 2009.	5.15	131	36%	92%	100%
0130	PCB-1242	4/16/2018	<0.00003	0.29	0.01 ^{1b}	No Discharge	NA	0	Quantify DMRs for Oct-2010 PCB Andechs were not detected from 2005 to 2010.	NA ^{1b}	0 ^{1b}	0%	0% ^{1b}	0% ^{1b}
0130	PCB-1254	4/16/2018	<0.00003	0.29	0.01 ^{1b}	No Discharge	NA	0	Quantify DMRs for Oct-2010 PCB Andechs were not detected from 2005 to 2010.	NA ^{1b}	0 ^{1b}	0%	0% ^{1b}	0% ^{1b}
0130	PCB-1260	4/16/2018	<0.00003	0.29	0.01 ^{1b}	No Discharge	NA	0	Quantify DMRs for Oct-2010 PCB Andechs were not detected from 2005 to 2010.	NA ^{1b}	0 ^{1b}	0%	0% ^{1b}	0% ^{1b}
Marble K	TSS	4/16/2018	91	0.43	1108	Monitor Only	NA	41	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	289	NA	-122%	-328%
Marble K	Cadmium	4/16/2018	0.00112	0.43	0	0.0045 ^{1b}	0.0075	0.0012	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	0.0076	75%	7%	-60%
Marble K	Copper	4/16/2018	0.185	0.43	2.08	0.0134 ^{1b}	0.093	0.093	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	0.60	-111%	-77%	-242%
Marble K	Iron	4/16/2018	12	0.43	146.1	Monitor Only	NA	3.8	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	0.49	-269%	-216%	-569%
Marble K	Nickel	4/16/2018	0.186	0.43	2.411	0.117 ^{1b}	0.117	0.09	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	24	-65%	-42%	-324%
Marble K	Lead	4/16/2018	0.21	0.43	2.557	0.0645 ^{1b}	0.0645	0.13	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	0.57	-325%	-42%	-211%
Marble K	Zinc	4/16/2018	0.553	0.43	6.73	0.117 ^{1b}	0.117	0.57	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	3.6	-373%	3%	-81%
Marble K	PCB-1242	4/16/2018	<0.00097	0.43	0.01 ^{1b}	No Discharge	NA	0.01 ^{1b}	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	0 ^{1b}	NA	0% ^{1b}	0% ^{1b}
Marble K	PCB-1254	4/16/2018	<0.00097	0.43	0.01 ^{1b}	No Discharge	NA	0.01 ^{1b}	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	0 ^{1b}	NA	0% ^{1b}	0% ^{1b}
Marble K	PCB-1260	4/16/2018	<0.00097	0.43	0.01 ^{1b}	No Discharge	NA	0.01 ^{1b}	Third Quarter 2011 DMR for Marble K ^{1b} Flow was measured in September 2011.	0.223	0 ^{1b}	NA	0% ^{1b}	0% ^{1b}

Notes:

(a) Microbe, 2018. First Quarter 2018 Makeup Sample Analytical Results. Microbe Laboratories, Inc.

(b) USEPA, 2009. Authorization to Discharge Under the National Pollutant Discharge Elimination System Industrial Permit Number DCO0000094. United States Environmental Protection Agency. Effective July 19, 2009.

(c) Maximum Daily Limit listed in the 2009 NPDES Permit.

(d) Baseline concentration is based on the highest concentration listed on DMRs for Oct-2010 TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2009 to 2010 DMRs for Oct-2010.

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

(f) Flow was measured in September 2011.

(g) Not required by 2009 NPDES Permit.

(h) Data from the September 5, 2011 sampling for Marble K Flow was estimated based on the atom number of the storm water discharge for Marble K Flow in Section VII E of the 2009 NPDES Permit for Boring Generating Station.

(i) No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Goal for Marble K Flow in Section VII E of the 2009 NPDES Permit for Boring Generating Station.

(j) Marble K has no maximum daily limit for the constituents and is monitoring only. Value listed is the Maximum Daily Stormwater Discharge Concentration Goal for Marble K Flow in Section VII E of the 2009 NPDES Permit for Boring Generating Station.

(k) There is no discharge for PCB Andechs. Therefore, a baseline flow was not established. However, given that the concentration of PCB Andechs is zero, the load is also zero regardless of flow.

(l) Baseline concentration is based on the highest concentration listed on DMRs for Oct-2010 TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2009 to 2010 DMRs for Oct-2010.

Permit

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

Major: ✓

Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 101-Q - (no description)

Permitted Feature: 101 - External Outfall

DMR Due Date: 07/28/18

Report Dates & Status

Monitoring Period: From 04/01/18 to 06/30/18
Status: **NetDMR Validated**

Considerations for Form Completion

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

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH											
1 - Effluent Gross		Smpl.				=8.33		=8.33	12 - SU		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended											
1 - Effluent Gross		Smpl.				=91		=91	19 - mg/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease											
1 - Effluent Gross		Smpl.				<5.4		<5.4	19 - mg/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00980	Iron, total recoverable											
1 - Effluent Gross		Smpl.				=12		=12	19 - mg/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01027	Cadmium, total [as Cd]											
1 - Effluent Gross		Smpl.				=1.12		=1.12	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01042	Copper, total [as Cu]											
1 - Effluent Gross		Smpl.				=165		=165	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01051	Lead, total [as Pb]											
1 - Effluent Gross		Smpl.				=210		=210	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01067	Nickel, total [as Ni]											
1 - Effluent Gross		Smpl.				=198		=198	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01092	Zinc, total [as Zn]											
1 - Effluent Gross		Smpl.				=553		=553	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.				Req Mon MO AVG		Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
39496	PCB-1242											
1 - Effluent Gross		Smpl.				=0		=0	28 - ug/L		01/90 - Quarterly	GR - GRAB
Season: 0		Req.										

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
							Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
39504	PCB-1254	Smpl.					=0	=0	28 - ug/L	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross											
Season: 0		Req.					Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
39508	PCB-1260	Smpl.					=0	=0	28 - ug/L	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross											
Season: 0		Req.					Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
50050	Flow, In conduit or thru treatment plant	Smpl.					=0.278	=0.278	03 - MGD	01/90 - Quarterly	ES - ESTIMA
1 - Effluent Gross											
Season: 0		Req.					Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	01/90 - Quarterly	ES - ESTIMA
NODI: -		NODI									
TS000	Toxicity, Acute	Smpl.									
1 - Effluent Gross											
Season: 0		Req.					Req Mon MO AVG	Req Mon DAILY MX	2F - tox acute	01/5Y - Once Every 5 Years	24 - COMP24
NODI: -		NODI					E - Analysis Not Conducted/No Sample	E - Analysis Not Conducted/No Sample			

Submission Note

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

Edit Check Errors

No errors.

Comments

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

Attachments

Name	Type	Size
AttachmentsApril2018.pdf	pdf	84900

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-13 17:55 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-13 17:55 (Time Zone:-04:00)

Attachment 1

NPDES Permit DC 0000094

Permit Condition Part II. A

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

Storm Event Monitoring Requirements				
Outfall Number	Sample Date	Duration of Storm Event (in hours)	Rainfall Measurement (in inches)	Duration Between Measurable Storm Events (in hours)
013	04/16/2018	13	1.54"	600
101	04/16/2018	13	1.54"	600

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction for April 16, 2018 Storm Event

Outfall	Parameter	Sample Date	Concentration (mg/L) (a)	Average Flow (cfs) ^b	Load (mg/s)	Maximum Daily Limit (mg/L) (c)	Maximum Daily Stormwater Discharge Concentration Goals for Metals (b)	Baseline Concentration (mg/L)	Source of Baseline Concentration ^d	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ^e	Pollutant Concentration Reduction Compared with Baseline Concentration ^f	Pollutant Load Compared with Baseline Load ^g
0130	TSS	4/16/2018	61	0.29	500.93	100	100	42	(b) Highest TSS discharge data for Ocala 0130 Quantity stormwater DMR data for April-July 2006	4.82	5732	39%	45%	91%
0130	Cadmium	4/16/2018	<0.00250	0.29	0.01 ^h	0.00455	0.0045	0.00075	Highest TSS discharge concentration from DMR data for Ocala 0130 Quantity stormwater DMR data for April-July 2006	7.48	0.16	100%	100%	100%
0130	Copper	4/16/2018	0.006	0.29	0.06	0.01344	0.0134	0.064	(b) Reasonable potential analysis concentration for cadmium	3.14	5.7	46%	89%	69%
0130	Iron	4/16/2018	0.6	0.29	4.93	1.00	NA	5.90	(b) Highest copper discharge data for Ocala 0130 Quantity stormwater DMR data for April-July 2006	0.148	24	40%	90%	80%
0130	Nickel	4/16/2018	0.028	0.29	0.02	0.117 ^h	0.117	0.056	(f) Highest iron discharge data for Ocala 0130 Quantity stormwater DMR data for April-July 2006	0.148	0.23	98%	95%	91%
0130	Lead	4/16/2018	0.0126	0.29	0.10	0.06458	0.0545	0.023	(b) Reasonable potential analysis concentration for nickel	7.46	4.8	80%	45%	69%
0130	Zinc	4/16/2018	0.0745	0.29	0.6	0.11718	0.117	0.9	(b) Highest zinc discharge data for Ocala 0130 Quantity stormwater DMR data for April-July 2006	5.15	131	36%	92%	100%
0130	PCB-1242	4/16/2018	<0.00063	0.29	0.01 ^h	No Discharge	NA	0	Quarterly DMR data for Ocala 0130 PCB Andechs were not detected from 2005 to 2010	NA ^h	0 ^h	0%	0% ⁱ	0% ^j
0130	PCB-1254	4/16/2018	<0.00093	0.29	0.01 ^h	No Discharge	NA	0	Quarterly DMR data for Ocala 0130 PCB Andechs were not detected from 2005 to 2010	NA ^h	0 ^h	0%	0% ⁱ	0% ^j
0130	PCB-1260	4/16/2018	<0.00093	0.29	0.01 ^h	No Discharge	NA	0	Quarterly DMR data for Ocala 0130 PCB Andechs were not detected from 2005 to 2010	NA ^h	0 ^h	0%	0% ⁱ	0% ^j
Marble K	TSS	4/16/2018	91	0.43	1108	Monitor Only	NA	41	Quarterly DMR data for Marble K ^h Flow was measured in September 2011	0.223	269	NA	-122%	-35%
Marble K	Cadmium	4/16/2018	0.00112	0.43	0	0.0045 ^h	0.0075	0.0012	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	0.0076	75%	7%	-60%
Marble K	Copper	4/16/2018	0.165	0.43	2.009	Monitor Only	0.0134 ^h	0.063	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	0.90	-1131%	-77%	-342%
Marble K	Iron	4/16/2018	12	0.43	146.1	Monitor Only	NA	3.6	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	24	-2691%	-100%	-550%
Marble K	Nickel	4/16/2018	0.198	0.43	2.411	0.117 ^h	0.117	0.69	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	0.57	-65%	-100%	-324%
Marble K	Lead	4/16/2018	0.21	0.43	2.567	0.0045 ^h	0.0645	0.13	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	0.82	-228%	-62%	-211%
Marble K	Zinc	4/16/2018	0.553	0.43	6.73	0.117 ^h	0.117	0.57	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	3.6	-373%	NA	-87%
Marble K	PCB-1242	4/16/2018	<0.00087	0.43	0.01 ^h	No Discharge	NA	0.01 ^h	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	0 ^h	NA	0% ⁱ	0% ^j
Marble K	PCB-1254	4/16/2018	<0.00087	0.43	0.01 ^h	No Discharge	NA	0.01 ^h	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	0 ^h	NA	0% ⁱ	0% ^j
Marble K	PCB-1260	4/16/2018	<0.00097	0.43	0.01 ^h	No Discharge	NA	0.01 ^h	Third Quarter 2011 DMR for Marble K ^h Flow was measured in September 2011	0.223	0 ^h	NA	0% ⁱ	0% ^j

Notes:

- Microbe, 2018 Fall Quarter 2018 Makeup Sample Analytical Results, Microbe Laboratories, Inc.
- Microbe, 2006 Administrative Discharge Under the National Pollutant Discharge Elimination System Industrial Permit Number DCO000004, United States Environmental Protection Agency, Effective July 19, 2006
- Marble K Daily Limit listed in the 2006 NPDES Permit

Notes:

- cg - cubic feet per second
- mg/L - milligram per liter
- mg/s - milligram per second
- NA - Not Applicable
- Pollutant concentration was not detected
- Concentration used in pollutant load calculation is set to zero
- Flow was measured when samples were collected
- Not required by 2006 NPDES Permit for Blasting Generating Station
- Data from the September 5, 2011 sampling event for Marble K was established as the baseline load because it was the last sample collected after Marble K was refilled. The refill was performed so that a representative sample could be collected from Marble K. Flow was estimated based on the storm intensity and catchment area.
- Marble K daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Goals for Metals listed in Section VIII E of the 2006 NPDES Permit for Blasting Generating Station
- Marble K daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Goals for Metals listed in Section VIII E of the 2006 NPDES Permit for Blasting Generating Station
- Positive values indicate that the April 16, 2018 concentrations are lower than the baseline concentration/basis.
- There were no detections of PCB Andechs.
- Baseline concentrations are based on the highest concentration listed on DMRs for Ocala 0130 from 2005 to 2007. TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the July-Sept 2009 to 2010 DMRs for Ocala 0130

Permit

Permit ID: DC0000094

Major: ✓

Permittee: PEPCO Environment Management Services

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

Facility: PEPCO - BENNING

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

Permitted Feature: 201 - External Outfall

Discharge: 201-A - INTERNAL MONITORING PT. 201

Report Dates & Status

Monitoring Period: From 04/01/18 to 06/30/18

DMR Due Date: 07/31/18

Status: **NetDMR Validated****Considerations for Form Completion**OIL/WATER SEPARATOR, DEMINERALIZERREGENERATION WASTEWATER,BOILER BLOWDOWN, SUMP FOR GROUNDWATER INFILTRATION,
FIRESIDEWASHING**Principal Executive Officer**

First Name: William

Last Name: Sullivan

Title: VP, Operations

Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

<https://netdmr.epa.gov/netdmr/protected/>

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-07-05 14:26 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-07-05 14:27 (Time Zone:-04:00)

2,2005 NetDMR

Permit

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

Major: ✓

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

Permitted Feature: 201 - External Outfall

Report Dates & Status

Monitoring Period: From 04/01/18 to 06/30/18

Status: **NetDMR Validated**

DMR Due Date: 07/31/18

*Considerations for Form Completion**Principal Executive Officer*

First Name: William
Title: VP, Operations

Last Name: Sullivan

Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

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

Submission Note

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

Edit Check Errors

No errors.

*Comments**Attachments*

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-07-05 15:25 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-07-05 15:25 (Time Zone:-04:00)

4/2008 NetDMR

Permit

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

Major: ✓

Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 202-A - COOLING TOWER BLOWDOWN

Permitted Feature: 202 - External Outfall

DMR Due Date: 07/31/18

Report Dates & Status

Monitoring Period: From 04/01/18 to 06/30/18

Status: **NetDMR Validated****Considerations for Form Completion**

Net Value of PCBs

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2492

No Data Indicator (NODI)

Form NODI: -

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

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

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 15:33 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 15:33 (Time Zone:-04:00)

7/20/18 NetDMR

Permit

Permit ID: DC0000094

Major: ✓

Permittee: PEPCO Environment Management Services

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

Facility: PEPCO - BENNING

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

Permitted Feature: 202 - External Outfall

Discharge: 202-B - COOLING TOWER BASIN WASH WATER

Report Dates & Status

Monitoring Period: From 04/01/18 to 06/30/18

DMR Due Date: 07/31/18

Status: **NetDMR Validated***Considerations for Form Completion*

COOLING TOWER UNITS 15 & 16

Principal Executive Officer

First Name: William

Last Name: Sullivan

Title: VP, Operations

Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

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

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 15:40 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 15:40 (Time Zone:-04:00)

%2008 NetDMR

Permit

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

Major: ✓
Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 203-A - COOLING TOWER BLOW DOWN

Report Dates & Status

Monitoring Period: From 04/01/18 to 06/30/18
Status: **NetDMR Validated**

DMR Due Date: 07/31/18

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00010	Temperature, water deg. centigrade	Smpl.									
1 - Effluent Gross											
Season: 0		Req.									
NODI: -		NODI									
00400	pH	Smpl.									
1 - Effluent Gross											
Season: 0		Req.									
NODI: -		NODI									
01034	Chromium, total [as Cr]	Smpl.									
2 - Effluent Net											
Season: 0		Req.									
NODI: -		NODI									
01092	Zinc, total [as Zn]	Smpl.									
2 - Effluent Net											
Season: 0		Req.									
NODI: -		NODI									
39496	PCB-1242	Smpl.									
1 - Effluent Gross											
Season: 0		Req.									
NODI: -		NODI									
39504	PCB-1254	Smpl.									
1 - Effluent Gross											
Season: 0		Req.									
NODI: -		NODI									
39508	PCB-1260	Smpl.									
1 - Effluent Gross											
Season: 0		Req.									
NODI: -		NODI									
50050	Flow, in conduit or thru treatment plant	Smpl.									
1 - Effluent Gross											
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD						
NODI: -		NODI	C - No Discharge	C - No Discharge							
50064	Chlorine, free available	Smpl.									
1 - Effluent Gross											
Season: 0		Req.									
NODI: -		NODI									
71871		Smpl.									

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-07-05 15:40 (Time Zone:-04:00)

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User: FARIBA12
 Name: Fariba Mahvi
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 Date/Time: 2018-07-05 15:40 (Time Zone:-04:00)

%,2008 NetDMR

Permit

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

Report Dates & Status

Monitoring Period: From 04/01/18 to 06/30/18
 Status: **NetDMR Validated**
 DMR Due Date: 07/31/18

Considerations for Form Completion**Principal Executive Officer**

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

No Data Indicator (NODI)

Form NODI: -

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-07-05 15:43 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-07-05 15:43 (Time Zone:-04:00)

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

Annual Inspection of the Drainage System

An internal inspection of the facility's drainage system, using closed-circuit television (CCTV), was conducted between February 26 and April 18, 2018. A summary of the inspection results is provided below:

An AECOM subcontractor (Mobile Dredging & Video Pipe, Inc) performed a CCTV inspection of the main 48-inch/54-inch storm drain pipe (approximately 2,300 LF) and the lateral storm drains (approximately 8,500 LF) that discharge to Outfall 013. It should be noted this CCTV inspection was limited to the storm drain lines; the CCTV equipment was not capable of inspecting the newly installed stormwater treatment structures. In addition, the small diameter laterals (4-6 inches) could not be inspected due to size.

AECOM's evaluation of the CCTV inspection data indicated that the majority of storm drain lines that discharge to Outfall 013 are in relatively good condition. AECOM did not observe any areas of active groundwater inflow or weeping to the storm drain system. However, the inspection identified evidence of infiltration, structural defects, and deposits and debris in various locations with the drainage system. AECOM classified many of these conditions as "minor" and recommended that they continue to be monitored during future by CCTV inspections to assess whether corrective actions may be warranted in the future. In addition, AECOM recommended that the following corrective actions to address those conditions classified as significant or moderate:

1. Remove accumulated sediments and debris (this action has been completed, as described below).
2. Repair structural defects observed at storm drain laterals in the following areas:
 - a) Manhole (MH) 38A to Inlet (I) 39 - repair to seal the observed break/void in the storm drain lateral line.
 - b) MH 51C to Discharge 407 - repair to seal the observed break/void in the storm drain lateral line.
 - c) Catch basin inlets at I-75, I-76, and I-77 - repairs should include rehabilitating the catch basins structures
 - d) Inlet I-30 - repair to seal the observed break/void in the storm drain lateral line.
 - e) Inlet I07A to MH-4 – repair to seal the observed break/void in the storm drain lateral line.
 - f) Inlet I-13A to I-20.
 - g) Inlet I15 to the Lift Station.
3. Evaluate the potential contribution of metals or TSS constituents to stormwater from metal pipes (specifically cast iron and corrugated metal pipes), and assess the feasibility of repairing or replacing the metal portions of the storm drain lines via insertion and liners.

AECOM identified this as a long-term corrective action because several of the metal pipes are in fair condition and located upstream of stormwater treatment via the newly installed treatments facilities.

4. Evaluate the following areas for structural stability of piping to determine if repairs are needed:

- a) I54 to Discharge 403
- b) I72 to Discharge 416
- c) I06 to I04
- d) I37 to I29 – junction from lateral to main trunk line

Pepco is currently working on prioritizing the repair work and obtaining proposals from contractors to perform the repairs. The progress on this effort will be provided with the next quarterly report.

Sediment Removal

During and after completion of the CCTV inspection, Pepco conducted cleaning of the storm drain system via pressure washing and jetting and removed approximately 14.8 tons of sediment and debris for off-site disposal. This material was collected in sludge boxes and disposed off-site in a permitted facility. During pressure washing, the lines were capped at a downgradient location acting as a sump to prevent discharge to the Anacostia River. Water collected in the sump was removed by vacuum truck, placed in the frac tanks at the site, filtered, and transported to Blue Plains Wastewater Treatment Plant in DC, in compliance with a hauler permit issued to Pepco by DC water.

Proposed Schedule for Future Drainage System Inspections

Under paragraph 16 of the Consent Decree, Pepco is required to conduct CCTV inspection of the drainage system on an annual basis. Consistent with the schedule followed for this year, Pepco proposes to conduct this inspection by the end of the second quarter of each year going forward. Pepco will initiate the inspection as early in the calendar year as weather and site conditions permit. This schedule will allow for any necessary corrective actions to be initiated (and completed, where feasible), during the second half of the year. Accordingly, the next inspection will be conducted during the period between January 1 and June 30, 2019.

Site Drainage Map

Pepco is currently working on updating the drainage map based on the CCTV inspection data to reflect the changes to the site drainage areas as a result of the installation of the stormwater treatment system and the new fueling island. The updated drainage map will be added to the Stormwater Pollution Prevention Plan, and provided to EPA with the next quarterly report.

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

Storm Drain Inlets Inspection Logs

The inspection logs for April - June 2018 are attached.

Weekly Inspection of Drain Guards 2018

Deck Number		Observations	Control Type	Normal Inspection Date	Inspected By	Comments	Inspection Date	Inspected By	Comments	Inspection Date	Inspected By	Comments
1	2	24"x36"	Drain guard plus	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
2	2	27"x27"	Heavy metal witch hat	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
3	3	27"x27"	Heavy metal witch hat	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
4	4	24"x24"	Heavy metal witch hat	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
5	5	24"x24"	Heavy metal witch hat	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
6	6	24"x24"	Drain guard plus	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
7	7	36"x63"	Drain guard plus	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
8	8	36"x63"	Heavy metal witch hat	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
9	24" Round	Heavy metal sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
10	24" Round	Heavy metal witch hat / sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
11	24" Round	Heavy metal witch hat / sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
12	24" Round	Heavy metal sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
13	42" Round	Heavy metal sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
14	36"x63"	Drain guard plus	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
15	36"x63"	Heavy metal sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
16	24" Round	Heavy metal sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
17	45"x45"	Heavy metal sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
18	31"x31"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
19	31"x31"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
20	27"x49"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
21	20" Round	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
22	18"x25"	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
23	30" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
24	30" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
25	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
26	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
27	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
28	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
29	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
30	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
31	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
32	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
33	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
34	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
35	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
36	24" Round	Drain guard plus with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
37	27"x27"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
38	110" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
39	20	231" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
40	231" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
41	89"x48"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
42	89"x48"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
43	44	48"x48"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
44	48	48"x48"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
45	231" long	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
46	45	231" long	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
47	47	27"x27"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
48	24"x24"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
49	49	145"x12"	Heavy metal with sock	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
50	29"x32"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
51	65"x49"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
52	24" Round	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
53	145"x12"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
54	117" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
55	117" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
56	35"x35"	Heavy metal with sock	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
57	24" Round	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
58	35"x35"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
59	59" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
60	117" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
61	117" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
62	117" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
63	117" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
64	32" long	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
65	66	96"x48"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
66	67	24" Round	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
67	68	48" wide	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
68	70	70"x37"	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
69	70	70"x37"	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
70	70	70"x37"	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
71	24" Round	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
72	24" Round	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
73	37"x42"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
74	37"x42"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
75	24" Round	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
76	37"x42"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
77	35"x35"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
78	14"x14"	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
79	14"x14"	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
80	24" Round	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
81	10"x18"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
82	15"x19"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
83	19"x19"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
84	10"x18"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
85	19"x19"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
86	20"x20"	Heavy metal witch hat	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
87	48"x16"	Heavy metal with sock	5/1/2018	CV	Replaced Filter	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
88	30"x20"	Curb guard plus with sock	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
89	8" Round	Curb guard plus with sock	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
90	18"x18"	Curb guard plus with sock	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
91	24"x11"	Inlet guard	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
92	24"x11"	Inlet guard	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
93	98	70"x37"	Heavy metal guard with boom	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok
94	48"x40"	Heavy metal boom curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
100	24"x11"	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
101	27"x27"	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	
102	17"x16"	Curb guard plus	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	5/1/2018	CV	Found Ok	

Weekly Inspection of Drain Guards 2018

[illegible]

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

Monthly Site Inspections

The site-wide inspection logs for April - June 2018 are attached. Any issues or deficiencies found during inspections were brought to the attention of area supervisors to make sure they were corrected. As part of the metals management practices at the site, off line transformers removed from service and brought in to the site are promptly moved to the Transformer Shop in Building 56 or new transformer storage shed while awaiting processing and disposal. Clean Venture (Pepco's underground maintenance contractor) ensures the inlets in the vicinity of construction areas are properly covered with filter fabric topped with stone to minimize entry of solids into the storm drain system (for example during the removal of an existing fueling island, all the inlets in the vicinity of the construction area were covered with filter fabric and secured with blue stone). All contractors working at the site are instructed to sweep the construction areas and remove any unneeded equipment and materials from the site at the end of each work day.

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report



Inspection Date: Apr 13 2018
 Inspector: Terry Mowrer

Inspection Time: 8:36 AM
 Inspector's Signature: Terry Mowrer

Good Housekeeping Procedures	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Are outside work areas clean, dry, and free of litter and debris?	✓		✓		✓		✓		✓		
Is the grass and plants properly maintained in the area?	✓		✓		✓		✓		✓		eg removed the bucket left by the contractor
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?	✓	✓		✓		✓	✓		✓	✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		Called clean venture to put the boom back around inlet 29.
Are catch basins in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		checked
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		



Pepco – Benning Road Facility

Site Wide Monthly Inspection Report

Jerry Mowat
Fariba Mahvi
Apr. 13, 2018
0830

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

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report



Inspection Date: May 22 2018
 Inspector: Tony Monahan

Inspection Time: 0945 AM
 Inspector's Signature: Tony Monahan

Good Housekeeping Procedures	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Are outside work areas clean, dry, and free of litter and debris?	✓		✓		✓		✓		✓		Former Power Gravel in parking lot Need Pick up the gravel grass needs clipp
Is the grass and plants properly maintained in the area?		✓	✓		✓		✓		✓		
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?		✓		✓		✓		✓		✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		Clean Venture Replaced Storm Drain 69
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		



Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Monday 22.10.10
948 PM
Terry Morris / Saso Savoy

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

3-28-2018

Pepco – Benning Road Facility Site Wide Monthly Inspection Report

Inspection Date: 3-22-2018
Inspector: T. M. ...

Inspection Time: 9:30 AM
Inspector's Signature: Matthew ... / Tony ...



Good Housekeeping Procedures

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Are outside work areas clean, dry, and free of litter and debris?	✓		✓		✓		✓		✓		JOE CLEAN UP GRAVEL ROLLWAY.
Is the grass and plants properly maintained in the area?	✓		✓		✓		✓		✓		Grass was cut
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?		✓	✓			✓		✓		✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		All Booms looking OKAY. Check for debris
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		check 4778 drains
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?		✓		✓		✓		✓		✓	



Pepco -- Benning Road Facility

9:36 AM

JUNE 2018

Site Wide Monthly Inspection Report

Maureen Bask/Tony Maureen

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

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

Status of Stormwater Treatment System

The construction of the stormwater treatment system was completed on December 22, 2017, and the system was placed into operation. In accordance with paragraph 39 of the Benning Consent Decree, Pepco conducted Acceptance Testing of the stormwater treatment system to ensure the system meets its performance objectives in accordance with the Stormwater Treatment System Design Report. The acceptance testing involved two steps. The first step was a thorough inspection of the stormwater treatment system at each of the four hot spots by an authorized representative of the filtration equipment supplier (Contech Engineering). This inspection was completed on February 26, 2018, and indicated that the treatment system components (jellyfish and storm filter units) appeared to have been installed properly. The second step was to conduct two rounds of influent and effluent sampling at each of the four hot spots during qualifying storm events following the system inspection. The two rounds of sampling were conducted on March 20 and April 16, 2018. The initial evaluation of the sampling results raised questions about whether the sampling methods used were effective to obtain representative samples. After consultation with the supplier of the treatment system equipment, Pepco decided to install permanent sampling ports at the treatment components to facilitate the future performance testing as required by the consent decree. This work was completed May 29, 2018.

The results of the first two rounds of quarterly sampling at Outfall 013 since the stormwater treatment system was installed indicated that the system was not functioning as expected. A Compliance Action Plan has been prepared by AECOM to evaluate the performance of the system, and to identify and implement corrective actions to ensure that the treatment system effluents are in consistent compliance with the facility's NPDES permit limits. The Plan was initially submitted to EPA on June 4. Table 1 of the Plan summarized the specific action items completed or underway at that time. For example, Task 4 of the Table indicated that Pepco completed the Operation and Maintenance (O&M) inspection of the system within 180 days from the date the system was first placed into operation, as required by the consent decree. This O&M inspection was conducted between May 14 -18, 2018 by an authorized representative of Contech.

Table 1 of the Plan was updated and submitted to EPA on July 5, 2018 (see attached). The updated Table 1 identifies the actions undertaken since the June 4 version, along with planned near term actions and the time line to complete them. AECOM and Flippo completed the review of all as-built survey data collected in May and June. AECOM completed its system hydraulic evaluation and delivered drawings and specifications for corrective actions to Pepco and Flippo on July 13, 2018. Flippo commenced construction on corrective actions on July 16 and is scheduled to complete the work by August 15.

Pepco plans to collect the third quarter compliance samples, as well as additional influent and effluent samples to evaluate the treatment system performance, as soon as possible following completion of these corrective actions.

Table 1. Recommended Initial Action Plan

Task Recommended Action	Structures	Action items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)
1 Review As-built Drawings - Rationale: Required by DOEE Stormwater Management Division as part of construction completion; also needed for system evaluation - Review, identify missing information and items needing clarification - Collect missing information - Evaluate potential impact of deviations - Identify and implement fixes, if needed	All	AECOM/Flippo	AECOM completed a review of as-built drawings on 4/30/18. Flippo responded 5/31/18. AECOM completed the additional as-built survey on 5/24/18 to fill data gaps identified by AECOM. AECOM currently performing an as-built review and hydraulic evaluation, which was anticipated to be completed by 6/8/18.	Pepco SWTM project team (Pepco, AECOM, and Flippo) participated in a technical meeting on 6/13/18 to discuss the proposed Initial Corrective Actions (ICAs) for stormwater treatment. Based on this meeting, an agreed upon draft schedule was developed for data collection, treatment design, and construction/installation. AECOM and Flippo have completed collection and review of initial (6/22/18) and additional survey data points (7/3/18). On 6/18/18, AECOM began working to finalize system hydraulic evaluation and corrective actions. AECOM is currently on schedule to deliver drawings and specifications for corrective actions to Pepco on 7/13/18.
2 CCTV Inspection of Drainage System - Rationale: Consent Decree requirement; also needed for system performance evaluation - Includes new storm drain lines installed as part of treatment system, but not treatment system components or structures	Site-wide storm drain system	AECOM/Pepco	CCTV inspection completed; accumulated sediment and debris identified during inspection (9.5 tons) was removed as of 5/29/18.	AECOM submitted draft report and received comments from Pepco. CCTV Inspection Report (Rev Final) submitted to Pepco on 7/5/18.
3 Test Functioning of the Check Valves - Rationale: To ensure check valves are functioning as designed and not impeding flow - Flippo inspected the check valves and noted minor debris, but no blockage	Check valves at HS1 and HS4	Flippo	Completed on 4/24/18.	The need and use of check valves will be evaluated as part of Task 1.
4 System Operation & Maintenance (O&M) - Rationale: O&M per manufacturer's recommendations key to system performance - Bi-annual O&M inspections by certified CONTECH O&M Contractor, as required by Consent Decree - Quarterly visual and physical inspection of treatment structure components - Cleaning of accumulated sediment in accordance with O&M manual including after bypass events - Replacement of Jellyfish and StormFilter media for proper performance - Documentation of O&M activities	Jellyfish, StormFilters, and DownSpout StormFilters	Pepco/i-STORMWATER (Pepco's O&M Contractor)	i-STORMWATER has performed two O&M inspections. 2/26/18 and 5/14/18 – 5/18/18. The most prevalent observation reported by i-STORMWATER was that only a fraction of stormwater was being diverted into the treatment units at the upstream flow splitters. Initial corrective action is to adjust flow splitters as necessary to ensure proper flow of stormwater into the treatment units. Additional corrective actions may be identified following completion of Task 1, which includes a full as-built review and hydraulic evaluation.	Following project team meeting on 6/13/18, O&M recommendations from i-STORMWATER were incorporated into the ICA table.
5 Dry Condition Inspection - Rationale: To inspect each treatment structure. - Document any conditions or deficiencies impeding treatment.	All	AECOM/i-STORMWATER	Completed on 5/15/18. Recommendations from i-STORMWATER are the same as above.	Following project team meeting on 6/13/18, Dry Conditions inspection recommendations from i-STORMWATER were incorporated into the ICA table.
6 Wet Condition Inspection - Rationale: To inspect and observe the functionality of treatment structures during a rain event. - Document any conditions or deficiencies impeding treatment.	All	AECOM/ CONTECH/ i-STORMWATER	Completed on 5/18/18. Recommendations from i-STORMWATER are the same as above. Recommendations from CONTECH include: 1. Modifications or repairs at flow splitters to ensure proper flow to treatment system 2. Resealing of structures forebay walls, clearwell walls, and longitudinal wall-to-floor joints.	Following project team meeting on 6/13/18, Dry and Wet Conditions inspection recommendations from i-STORMWATER and CONTECH were incorporated into the ICA table.

Task Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)
7 Clean Jelly Fish Unit Deck - Rationale: Per CONTECH, sediment on JF deck could result in erroneous results - CONTECH recommends cleaning of deck and backwash pool prior to sampling - Sediment accumulates at these locations through grated covers or during bypass flow	Jellyfish	Pepco / i- STORMWATER	3. Investigation of potential backwater conditions at StormFilter units 4. Repair leaks at deck fasteners at Jellyfish JF-1. 5. Repair joint leak in weir wall to filter deck at inlet Jellyfish I68. AECOM has collected additional field data to determine necessary adjustments to flow splitters and will document findings in a tech memo expected by 6/08/18. Corrective actions will be implemented as soon as possible thereafter. Additional corrective actions may be identified following completion of Task 1, which includes a full as-built review and hydraulic evaluation.	No update (7/6/18).
8 Installation of Fixed Sampling Points - Rationale: Recommended by CONTECH upon reviewing two rounds of initial acceptance testing results - CONTECH recommends fixed, dedicated sample ports and using pumps for sampling - CONTECH's approach facilitates collection of more representative treated/untreated samples - Based on a call with CONTECH technical staff, AECOM prepared a SOW for this installation	Jellyfish and StormFilters	AECOM / i- STORMWATER	Completed on 5/29/18.	No update (7/6/18).
9 Additional Influent and Effluent Sampling - Rationale: Evaluate performance of individual treatment system components - Results of initial acceptance testing sampling (completed April 2018) may not be representative of system performance due to lack of proper flow to treatment components and difficulty of isolating influent and effluent flows for sampling - Additional samples to be collected using new sampling points once corrective actions identified in Tasks 1-8 are implemented.	Jellyfish and StormFilters	AECOM	To be scheduled for qualifying rain event following completion of Tasks 1-8.	No update (7/6/18).
10 Flood Treatment Structures to Rinse Fines - Rationale: To rinse filters and underdrains of zeolite dust per CONTECH recommendation - Zeolite dust itself has no metals, but could adsorb metals - Zeolite dust, if present in effluent, could result in higher effluent concentrations	StormFilters	Pepco / i- STORMWATER	Need for this task will be reevaluated based on the findings of Tasks 1-9.	No update (7/6/18).

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

Stormwater Management Training

The attached list includes the name of the employees working at Benning who received the Stormwater Management Training during the second quarter 2018.

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

Stormwater Pollution Prevention Plan

The updated Sections 4.2 and Summary Table 1 of the Plan are attached. Section 4.2 provides an update on the status of Storm Water Retention Structure at Outfall 101. Summary Table 1 identifies the three new liaisons named to the Pollution Prevention Team during April - June 2018 (see also paragraph 68.a.8).

4.0 POLLUTION PREVENTION MEASURES AND CONTROLS

4.1 EXISTING MEASURES AND CONTROLS

Various measures and controls are used at the Benning Service Center to reduce or prevent the transport of pollutants into storm water discharges.

Pepco completed the implementation of Phase 1 and 2 measures of the TMDL-Implementation Plan in December 2012 and completed the implementation of the Phase 3 implementation plan (Appendix B) in September of 2015. Additional measures have been implemented pursuant to the Consent Decree.

The following is a description of the existing BMPs and control measures in place at the Benning Service Center Facility:

Storm Water Treatment System: Construction of the storm water treatment system was completed in December 2017 and placed into operation. As described in the Final Storm Water Treatment System Design Report (Appendix E), the treatment systems are located at the following four identified “hot spots”: (1) transformer test shop area, (2) salvage yard area, (3) former fuel tank area, and (4) former power plant area.

The storm water treatment systems consist of a combination of Contech technologies – DownSpout StormFilter, Jellyfish Filter and StormFilter systems.

DownSpout StormFilter systems are installed at the existing loading dock roof downspouts on the west face of Building No. 56 and provide filtration of roof runoff to remove dissolved metals such as zinc, copper and lead.

New inlets and manholes installed as part of the treatment system are equipped with Jellyfish Filters to collect and/or treat storm water runoff from impervious surface areas to remove TSS, oil and floatable trash from storm water at pollutant source locations.

StormFilter storm water treatment devices are installed within large underground concrete vaults and consist of numerous 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 storm water runoff.

The storm water treatment system is maintained by a contractor certified by Contech.

Storm Drain Inlet Controls: The storm drain inlets at the facility are fitted with a sediment filter and metal absorbing booms. The specific controls in place at each inlet are described in Summary Table 5 in Appendix D. Examples of the controls are shown in Appendix G. As described below, the controls 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 to ensure that any needed replacements are made within 48 hours after the need for replacement is identified.

Metals Management: This control measure includes the following elements:

- Off-line or removed from service transformers are to be staged within the covered storage facility (Building 67) pending processing or disposal,
- Vendors will be requested to use newer disposal bins and replace rusty bins; scrap metal bins will be stored indoors wherever possible and emptied as soon as possible after they are filled;
- All wire splicing activities conducted as part of cable installation training and repair will take place indoors;
- Large transformers are scrapped whenever possible at the facility where the units were in service;
- As described further below, the facility will be inspected monthly to identify any unneeded, used, or scrap equipment or materials which are exposed to storm water and arrange to have such equipment or materials 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. Cover may consist of wrapping the materials or equipment with waterproof material to prevent exposure to precipitation.

Storm Drain System Inspection, Maintenance and Repair: The storm drainage system at the Benning Service Center facility is to be 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 will be inspected by a qualified contractor using closed circuit television or other appropriate technology. In conjunction with the inspection, any accumulated sediments will be removed and any damaged lines will be promptly repaired or replaced.

Low Impact Development (LID) Projects: There are three LID projects in place at the Benning Service Center consisting of previous planning areas designed to retain storm water. Two projects are located north of Building 59 and the third is located along the main road close to the 34th Street Guard Shed. The LID projects shall adhere to the following maintenance schedule:

Maintenance Schedule for Bio-Retention Areas			
Description	Method	Frequency	Time of the Year
Soil			
Inspect and repair erosion	Visual	Whenever needed	Whenever needed
Organic Layer			
Remulch any void areas	By hand	Whenever needed	Whenever needed
Remove previous mulch layer before applying new layer (optional)	By hand	Once every two to three years	Spring
Any additional mulch added (optional)	By hand	Once a year	Spring
Plants			
Removal and replacement of all dead and diseased vegetation considered beyond treatment	See planting specifications	Twice a year	March 15 – April 30 and Oct. 1 to November 30
Treat all diseased trees and shrubs	Mechanical or by hand	N/A	Varies, depends on insect or disease infestation
Watering of plant material shall take place at the end of each day for fourteen consecutive days after planting has been completed	By hand	Immediately after completion of project	N/A
Replace any deficient stakes or wires	By hand	N/A	Whenever needed

Storm Water Retention Structures: Two storm water retention ponds were constructed in May 2017. They are situated within the footprint of the former cooling tower basins. The structures are intended to retain and treat surface runoff.

Salt Storage: The salt storage pile is stored in a partially enclosed, three-sided structure (Building 45). The area in front of the building is graded to keep water out and keep the salt in the building. Straw bales are placed in front of the structure to minimize salt entering the storm drain system.

4.2 FUTURE MEASURES AND CONTROLS

Outfall 101 Storm Water Retention Project:

The proposed storm water retention structure to eliminate Outfall 101 was determined to not be feasible due to the substantial number of unexpected subsurface utility lines in the projects footprint. Pepco is currently working with a consultant to evaluate and implement alternative options to improve the quality of stormwater flows to Outfall 101.

4.3 EMPLOYEE TRAINING

Employee involvement is one of the key aspects of improving the quality of storm water runoff. As such, employee training is an integral part of successful implementation of the SWP3. The training program for implementation of the SWP3 will address such topics as the components and goals of the SWP3, spill prevention and response, good housekeeping, preventive maintenance, sediment and erosion control, and management of runoff. Training to ensure general awareness of the requirements under the facility's SWP3 will be provided to all employees and contractors whose activities at the facility may affect the quality of storm water discharges. The focus of the general awareness training program will be to teach employees to recognize and prevent situations, which may lead to contamination of storm water runoff at the Benning Service Center. More specific training will be provided to members of the Pollution Prevention Team and other employees and contractors whose job responsibilities include implementation of the SWP3. The specific training will include, as appropriate for each person, requirements and responsibilities for

contractors whose job responsibilities include implementation of the SWP3. The specific training will include, as appropriate for each person, requirements and responsibilities for inspection and maintenance of inlet controls, metal management, storm drain system maintenance, spill response, and operation and maintenance of the storm water treatment system and storm water retention structures (as they are brought on line). The training will be conducted by the Training department and each person shall receive the required training at least once per year. Records documenting that the required training has occurred will be maintained by the Training Department.

4.4 RECORDKEEPING AND INTERNAL REPORTING

Per EPA guidance, two types of written records will be maintained as part of the Benning Service Center SWP3: (1) documentation of spills, leaks, and other discharges; and (2) records of all routine maintenance and detailed inspections. Review of these records will enhance the effectiveness of the SWP3 and allow for early detection of potential problems. For instance, if it is noticed through review of the records that a problem is re-occurring in a specific time or at a certain site, preventative measures can be implemented.

All documentation regarding spills, maintenance, and inspections will be kept on file as part of the SWP3 and maintained in accordance with the EPA and the District Department of Energy and Environment requirements. The records will be maintained by the Corporate Environmental group for a minimum of three years.

Spill incidents, response procedures, and documentation procedures at the Benning Service Center are listed in the SPCC. Spill incidents are also listed in Summary Table 4 in Appendix D of this plan for the current year and three years prior. Summary Table 4 will be updated annually by the Storm Water Pollution Prevention Team as part of the comprehensive site evaluation (Chapter 6).

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 Benning Service Center are outlined in the SPCC plan. The various inspection and maintenance logs are in the SPCC plan. The Storm Water Pollution Prevention Team will review the maintenance and inspection logs annually as part of the comprehensive site evaluation (Chapter 6).

4.5 FACILITY INSPECTION PROGRAM

A facility inspection program is implemented at the facility to evaluate the adequacy and condition of existing control measures. A summary of the inspection program is provided in this section.

4.5.1 STORM DRAIN INLET INSPECTIONS

On a weekly basis each inlet control is inspected for sediment and pollutant accumulation, proper placement, structural condition, and general effectiveness. The inlet inspections are the responsibility of the Underground Maintenance department, but may be conducted by qualified contractors. Each inspection is to be conducted by a team consisting of one or more dedicated contractor employees and one representative from the Underground Maintenance department (or other appropriate department). The inspections are recorded in the Weekly Inspection of Drain Guards spreadsheet that is maintained onsite. A copy of the inspection log is provided in Appendix F.

Following a storm event, a drive-by inspection of storm drain inlets will be conducted each precipitation event exceeding 0.5 inches as measured at the facility rain gauge to ensure that the controls remain in place and are functioning properly. The drive-by inspection may be conducted by a single person. Such inspections should be documented using the inspection form in Appendix F, noting any corrective actions performed during the inspection or requiring follow up.

Following the completion of the weekly inspection, a list of necessary corrective actions is developed to document necessary corrective actions noted during the weekly inspection and the date that the actions were implemented. Corrective Actions are recorded on the inspection log (Appendix F). The inspection logs must be reviewed and signed monthly by the responsible manager within Underground Maintenance (or designee).

During each inspection, any accumulated sediment shall be removed from the inlet controls and any controls that are damaged or no longer functional, shall be replaced within 48 hours of discovery of the need to replacement.

Storm drain inlets controls shall be 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 shall replace it with a heavier duty or more effective control system.

Pepco shall evaluate and install other storm drain inlet controls as necessary to achieve performance objectives. The replacement of underperforming inlet controls shall be reported in the Quarterly Report sent to the EPA together with the actions taken to correct the underperformance.

4.5.3 MONTHLY SITE WIDE INSPECTIONS

A monthly inspection will be completed to assess the overall site conditions, evaluate the adequacy of existing site control measures, and identify issues that need to be addressed. The inspection will focus on:

- General outdoor material storage areas;
- Transformer storage area;
- Metal recycling bin storage;
- Waste containers;
- Bulk aboveground storage tanks (ASTs);
- Storm drain inlets;
- Facility outfalls;
- Drainage structures;
- Stormwater BMPs; and,
- General facility good housekeeping.

The inspections will be conducted by at least one member of the Storm Water Pollution Prevention Team. If the inspections are conducted by a third-party contractor, the results of the inspection will be reviewed and accepted by a member of the Team.

The inspection will be documented using the Monthly Site Wide Inspection form located in Appendix F. The inspection form includes information related to relevant site observations, recommended corrective actions, as well as information related to the inspection date, weather, and personnel conducting the inspection.

4.5.4 ANNUAL STORM WATER DRAINAGE SYSTEM INSPECTION

Pepco will conduct an annual visual inspection of the drainage system using CCTV or other appropriate measures. The inspection will be conducted by a qualified contractor and will aim to identify areas of pollutant buildup or structural issues. 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 these repairs. Documentation of the repairs will be maintained along with other documentation of actions to implement this SWP3.

4.6 SPILL PREVENTION AND RESPONSE

Spill prevention and response procedures developed for the site are a critical component for preventing the discharge of harmful pollutants to the drainage system. Potential spill sources with high risk for contaminating stormwater include the storage and handling of fuels/hazardous substances and equipment maintenance activities. Accidents and careless handling during these activities can cause spilled liquids to enter the stormwater drainage system.

Refer to the Benning Service Center's SPCC for detailed information about responding to a spill emergency.

SUMMARY TABLE 1
STORM WATER POLLUTION PREVENTION TEAM

Facility: Benning Service Center
 Owner: Pepco Holdings, Inc.
 Prepared by: Greenhorne & O'Mara, Inc./PEPCO
 Date: July 1995
 Revised: July 2018

Leader:	Colin Danville
Title:	Senior Engineer
Office Phone:	202-331-6467
Responsibilities:	Review of NPDES and storm water regulations Initial site evaluation Identification of potential pollutant sources Selection of proposed best management practices (BMPs) Evaluation of the SWP3 on an annual basis
Member # 1:	Tim Dinsmore
Title:	Senior Environmental Coordinator
Office Phone:	202-388-2429
Responsibilities:	Initial site evaluation Identification of potential pollutant sources Selection of proposed best management practices (BMPs) Evaluation of the SWP3 on an annual basis
Member # 2:	Andrew Hart
Title:	Manager - Material & Logistics
Office Phone:	(202) 388-2384
Responsibilities:	Identification of potential pollutant sources Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis
Member # 3:	Sean Burton
Title:	Supervisor - Facility Operations
Office Phone:	(202) 388-2438
Responsibilities:	Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis
Member # 4:	Kenneth Guiles
Title:	Supervisor - Distribution
Office Phone:	(202) 388-2117
Responsibilities:	Identification of potential pollutant sources Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis

SUMMARY TABLE 1
STORM WATER POLLUTION PREVENTION TEAM

Facility: Benning Service Center
 Owner: Pepco Holdings, Inc.
 Prepared by: Greenhorne & O'Mara, Inc./PEPCO
 Date: July 1995
 Revised: July 2018

Member #5:	Garry Gordon
Title:	Supervisor - Transportation
Office Phone:	(202) 388-2442
Responsibilities:	Identification of potential pollutant sources Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis
Member # 6:	Coressa Brown
Title:	Supervisor - Distribution
Office Phone:	(202) 360-0776
Responsibilities:	Identification of potential pollutant sources Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis
Member # 7:	Robert Berry
Title:	Supervisor - Safety W.A. Chester
Office Phone:	(202) 409-4163
Responsibilities:	Identification of potential pollutant sources Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis
Member # 8:	
Title:	
Office Phone:	
Responsibilities:	
Member # 9:	
Title:	
Office Phone:	
Responsibilities:	

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

Change in Management Responsibilities

There were three changes in management responsibilities during April - June 2018, as identified in Summary Table 1 of the Stormwater Pollution Prevention Plan (see paragraph 68.a.7). New members have been named to the pollution prevention team as liaisons for Facility Operations (Sean Burton) and Under Ground Distribution (Kenneth Guiles and Coressa Brown).

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

Status of Completion of Transformer Storage Shed

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

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

Status of Stormwater Retention Project

As reported to EPA by letter dated May 31, 2018 (copy attached), Pepco determined that the Stormwater Retention Project described in Section VIII of the Consent Decree was not technically feasible.

Pepco's technical consultant (Princeton Hydro) conducted pre-construction field investigations in January, March, and April 2018 to identify subsurface utilities in the proposed construction area for the stormwater retention basins. The investigation revealed the presence of live electric lines that were substantially more extensive than anticipated. It was not possible to re-route or otherwise avoid these utility lines within the time frame of June 30, 2018, required by the consent decree for the completion of this project. Pepco therefore determined that it must abandon this project as contemplated under Paragraph 8 of the consent decree.

Pepco is currently evaluating alternative options for treating of stormwater discharges from Outfall 101, and will provide a further update on the progress of this initiative in the next quarterly report.

In the meantime, Pepco has initiated street sweeping around the storm drain inlets and roadways draining to Outfall 101 to reduce the potential for suspended solids in the stormwater effluent (see the attached sweeping area map). The street sweeper began service on June 25 and will continue on a bi-monthly basis.

May 31, 2018

Via First Class Mail

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Re: U.S. v. Potomac Electric Power Company, Civ. No. 1:15-CV-01845;
Notice of Abandonment of Stormwater Retention Project

To the Branch Chief:

In accordance with the notice provision under Paragraph 199 of the consent decree entered in the above-referenced matter, I am writing to notify your office that Pepco has determined that the Stormwater Retention Project described in Section VIII of the consent decree is not technically feasible and therefore Pepco is unable to complete the project.

As described in more detail in the attached correspondence from Pepco's technical consultant, recently completed pre-construction field investigations to identify and clear all subsurface utilities revealed the presence of live electric lines, including lines believed to serve the metro rail line that runs along the southern edge of the Benning Service Center property, that are substantially more extensive than anticipated. It is not possible to re-route or otherwise avoid these utility lines within the time remaining before the June 30, 2018, deadline under the consent decree for the completion of the project. Pepco therefore has reluctantly determined that it must abandon the project as contemplated under Paragraph 8 of the consent decree (definition of "Stormwater Retention Project Abandonment").

Pepco remains committed to operating the Benning Service Center in a manner that is protective of the environment. Accordingly, we are evaluating alternative options for either eliminating or enhancing the treatment of stormwater discharges from Outfall 101. I will keep your office informed of our progress on this initiative.

Pepco understands that its decision to abandon the Stormwater Retention Project gives rise to a stipulated penalty pursuant to Paragraph 82.b. of the consent decree, and it is prepared to pay such penalty upon receipt of written demand for payment from EPA.

Please contact me at (202) 872-3055 if you need any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "M. W. Maxwell", with a long, sweeping underline that extends to the left.

Michael W. Maxwell
Vice President, Support Services

April 27, 2018

Pepco Holdings
Attn: Fariba Mahvi
Sr. Project Manager
Environmental Services

Email: fmahvi@pepco.com

Re: Benning Service Center
Stormwater Retention Project Plan
Utility Clearance

Dear Fariba,

This letter briefly summarizes the results of our efforts to document the locations and status of potential utility conflicts associated with the construction of the proposed Stormwater Retention Project at your Benning Service Center facility. As you are aware we contracted the services of Insight Utility Locating (Insight) on two separate occasions. Insight specializes in utility location and designation services and provided a crew to locate and field survey all identified utilities. Insight conducted an investigation of the site on January 19th and 22nd and an additional investigation was completed by Insight on March 7th and 8th. The results of their investigation and survey were provided to us in the form of an AutoCAD file which we could then incorporate into our design plans to determine any potential conflicts between the utilities and the design.

Although Insight was not able to determine status (active or not) of the utilities, the results indicated numerous conflicts with the proposed stormwater pipes and rain gardens. In total there were 24 specific potential conflicts identified, including conflicts in the proposed basins themselves as well as the inlet and outlet conduits which are necessary to convey runoff into and out of the proposed stormwater system. The vast majority of these conflicts are present regardless of the specific location of the project as is illustrated in the attached plan.

In addition to the two separate utility locating efforts conducted by Insight our staff also conducted two follow up site visits accompanied by Mr. Robert Vicks of PEPCO. These site inspections were completed on April 4th and 13th. The purpose of the site visits were to investigate the status of the identified utility mark outs previously provided by Insight. During the site survey it was determined that the majority of the utility lines marked by Insight were in fact active (energized at the time of inspection) and additional electrical current was detected in areas not previously marked by Insight. Mr. Vicks indicated the utilities were approximately two to three feet deep, which would conflict with the necessary elevations of the proposed stormwater conveyance conduits and the basins themselves. Mr. Vicks also stressed that his assessment could not conclusively rule out additional active utilities without direct access or utility testing.

Although based on his inspection Mr. Vicks could not conclusively identify what each of the demarcated energized utilities service, he had knowledge that suggested that some of the utilities were likely to service the nearby Metro Lines and the Minnesota Avenue Metro Station.



PrincetonHydro.com



1200 Liberty Place
Sicklerville, NJ 08081



908-237-5660



Utility conflicts are not unusual in similar developed/semi-urban retrofit projects and therefore some potential conflicts with existing utilities were expected at the onset of the project. However, the amount and significance of the conflicts which were identified during multiple site visits and investigations was not anticipated. As you are aware, I have been advised by utility professionals familiar with the project that many of the identified utility conflicts require outage requests which entail a substantial amount of time to be reviewed/resolved. Some of these conflicts may require outage requests that entail more than six months for clearance. Furthermore, the temporary shut off and relocation/reestablishment of the utilities adds a considerable amount of time and expense to the project that was not originally anticipated.

We attempted to design around the site's constraints in an effort to meet the project goals and objectives. These constraints include existing topography, existing drainage networks, and existing utilities; as well as practical constraints which include regulatory, project timeline and cost constraints. Despite the team's efforts to provide a cost effective solution, based primarily on the sheer amount and critical significance of the utility conflicts identified through this process (some are expected to service the adjacent Metro lines and station), the construction of the Stormwater Retention Project is not technically feasible at this time. Please do not hesitate to contact me with any questions. Thank you.



Clay Emerson PhD PE CFM
Senior Project Manager

Cc: Eric Murdock, Hunton & Williams

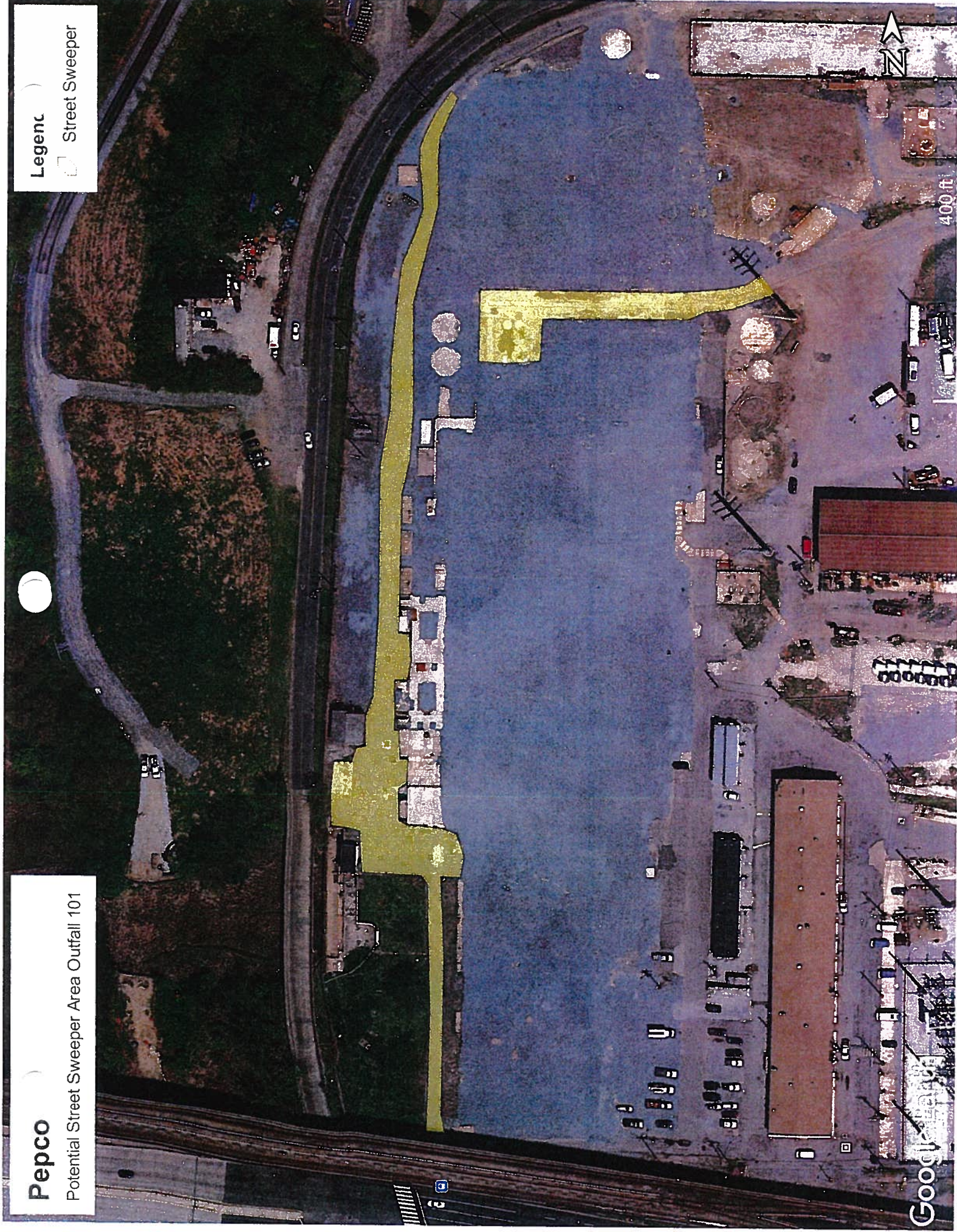
Enc: Utility Conflict Figure

Pepco

Potential Street Sweeper Area Outfall 101

Legend

Street Sweeper



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

Description of Non-Compliance

Pepco collected the second quarter compliance samples during a qualifying storm event on April 16, 2018 (see note below). The analytical results showed no exceedance of any daily maximum limits; however, there were exceedances of the monthly average limits for Copper, Zinc, and TSS, as summarized in the table below:

Analyte	Units	Permit Daily Maximum Limit	Permit Monthly Average Limit	April 16, 2018 sampling results
Copper	mg/L	0.0134	0.005	0.0068
Zinc	mg/L	0.117	0.073	0.0745
Total suspended solids (TSS)	mg/L	100	30	61

As described in detail in Paragraph 68.a.5 - Status of Stormwater Treatment System, a compliance action plan has been prepared by AECOM to evaluate the performance of the new stormwater treatment system, and to identify and implement corrective actions to ensure that the treatment system effluents are in consistent compliance with the facility's NPDES permit limits.

Pepco continues to implement the best management practices identified in the Phase III TMDL Implementation Plan and required by the consent decree, including storm drain inlet maintenance, metals management, and good housekeeping practices to eliminate or reduce sources of metals and solids to stormwater discharged from the site. In addition, Pepco completed the annual inspection of the drainage system in April 2018 and removed accumulated sediment from the main drainage pipe and laterals lines.

Note - In the last quarterly status report, Pepco described the samples collected on April 16, 2018, as make up samples for the first quarter. However, during a June 19, 2018, telephone conversation between EPA and Pepco, EPA confirmed that sampling events do not relate back to prior reporting periods, and thus the April 16 sampling event satisfied the compliance sampling requirement for the second quarter 2018, and advised Pepco to report the results of this sampling on the DMRs for the second quarter.