

Via U. S. MAIL - 7014 3490 0001 7124 5844

October 30, 2017

Ms. Ingrid H. Hopkins
Water Protection Division (3WP42)
US EPA - Region III
1650 Arch Street
Philadelphia, PA 19103-3029
(215) 814-5437

Re: Benning Facility Consent Decree (Civil Action No. 1:15-cv-018450) - Submission of quarterly reports (July-September 2017)

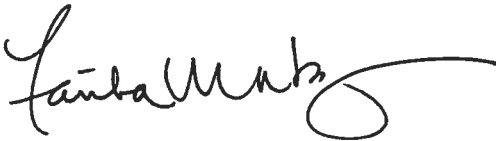
Dear Ms. Hopkins,

In accordance with Paragraph 68 of the Benning Facility Consent Decree, I am submitting the attached reports for EPA's review:

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

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

Sincerely,



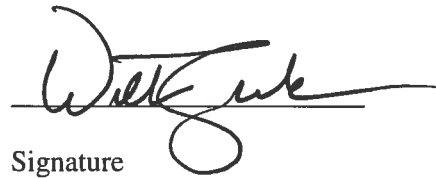
Fariba Mahvi
Sr. Project Manager
Environmental Services

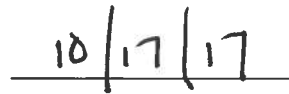
CERTIFICATION STATEMENT

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


Signature


Date

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

Discharge Monitoring Reports

Copies of DMRs for July - September 2017 are attached.

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services
Facility: PEPCO - BENNING
Permitted Feature: 003 - External Outfall

Major: 
Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 07/01/17 to 07/31/17
Status: **NetDMR Validated**

DMR Due Date: 08/28/17

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

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

Submission Note

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

Edit Check Errors

No errors.

Comments

There was no discharge in July 2017.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-08-15 15:30 (Time Zone:-04:00)

Report Last Signed By

User:
Name:
E-Mail:
Date/Time: (Time Zone:)

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services
Facility: PEPCO - BENNING
Permitted Feature: 003 - External Outfall

Major: 
Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 08/01/17 to 08/31/17
Status: **NetDMR Validated**

DMR Due Date: 09/28/17

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP,Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

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	Smpl.				=8.13		=8.13	12 - SU	0	01/DS - Once Per Discharge	GR - GRAB
1 - Effluent Gross												
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended	Smpl.					=3.7	=3.7	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
1 - Effluent Gross												
Season: 0		Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease	Smpl.					=11.2	=11.2	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
1 - Effluent Gross												
Season: 0		Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39496	PCB-1242	Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
1 - Effluent Gross												
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39504	PCB-1254	Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
1 - Effluent Gross												
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39508	PCB-1260	Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
1 - Effluent Gross												
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	Smpl.	=0.00592	=0.00592	03 - MGD		=0.00592	=0.00592	03 - MGD	0	01/DS - Once Per Discharge	MS - MEASRD
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										

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

Values for pH, TSS, and Oil/Grease were corrected on 10/16/2017 after re-examining the Lab reports today.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-16 11:24 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-16 11:24 (Time Zone:-04:00)

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User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services
Facility: PEPCO - BENNING
Permitted Feature: 003 - External Outfall

Major: 
Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 09/01/17 to 09/30/17
Status: **NetDMR Validated**

DMR Due Date: 10/28/17

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			#	Freq. of	Smpl.
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	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	Units			
00400 pH 1 - Effluent Gross	Smpl.				=7.69	=8		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.					=9.2	=9.2	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0	Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -	NODI										
00556 Oil & Grease 1 - Effluent Gross	Smpl.					=6.8	=6.8	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.	=0.0049	=0.0049	03 - MGD		=0.0049	=0.0049	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: 2017-10-16 11:36 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-16 11:37 (Time Zone:-04:00)

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User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit**Permit ID:** DC0000094**Major:** ✓**Permittee:** PEPCO Environment Management Services**Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON, DC20019**Facility:** PEPCO - BENNING**Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON, DC20019**Permitted Feature:** 013 - External Outfall**Discharge:** 013-A - BNON COOLING WATER BLOWDOWN**Report Dates & Status****Monitoring Period:** From 07/01/17 to 08/31/17**DMR Due Date:** 09/28/17**Status:** NetDMR Validated**Considerations for Form Completion****Principal Executive Officer****First Name:** William**Last Name:** Sullivan**Title:** VP, Operations**Telephone:** 202-872-2942**No Data Indicator (NODI)****Form NODI:** -

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3				
50050	Flow, in conduit or thru treatment plant	Smpl.	=0.00285	=0.0116	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		01/5Y - Once Every 5 Years	24 - COMP24
NODI: -		NODI				E - Analysis Not Conducted/No Sample	E - Analysis Not Conducted/No Sample					

Submission Note

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

Edit Check Errors

No errors.

Comments

- Toxicity Acute Sampling requirement was met, therefore, no additional sampling is required.

Attachments

No attachments.

Report Last Saved By**PEPCO Environment Management Services****User:** FARIBA12**Name:** Fariba Mahvi**E-Mail:** fmahvi@pepco.com**Date/Time:** 2017-09-20 10:58 (Time Zone:-04:00)

0/3 Q

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services

Facility: PEPCO - BENNING

Permitted Feature: 013 - External Outfall

Report Dates & Status

Monitoring Period: From 07/01/17 to 09/30/17

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: 10/28/17

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI:

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

Parameter		NODI	Quantity or Loading			Quality or Concentration				# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units			
00400	pH	Smpl.				=7.85		=7.85	12 - SU	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly
NODI: -		NODI										
00530	Solids, total suspended	Smpl.				=20		=20	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.				<=30 MO AVG		<=100 DAILY MX	19 - mg/L		01/90 - Quarterly
NODI: -		NODI										
00556	Oil & Grease	Smpl.										
1 - Effluent Gross												
Season: 0			Req.				Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly
NODI: -		NODI				B - Below Detection Limit/No Detection		B - Below Detection Limit/No Detection				
01027	Cadmium, total [as Cd]	Smpl.				=0.34		=0.34	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.				<=2.08 MO AVG		<=4.95 DAILY MX	28 - ug/L		01/90 - Quarterly
NODI: -		NODI										
X 01042	Copper, total [as Cu]	Smpl.				=5.9		=5.9	28 - ug/L	1	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.				<=5.24 MO AVG		<=13.44 DAILY MX	28 - ug/L		01/90 - Quarterly
NODI: -		NODI										
X 01045	Iron, total [as Fe]	Smpl.				=0.96		=0.96	19 - mg/L	1	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.				<=.69 MO AVG		<=1 DAILY MX	28 - ug/L		01/90 - Quarterly
NODI: -		NODI										
01051	Lead, total [as Pb]	Smpl.				=5		=5	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.				<=56.6 MO AVG		<=64.58 DAILY MX	28 - ug/L		01/90 - Quarterly
NODI: -		NODI										
01092	Zinc, total [as Zn]	Smpl.				=44.6		=44.6	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.				<=73.11 MO AVG		<=117.18 DAILY MX	28 - ug/L		01/90 - Quarterly
NODI: -		NODI										
39496	PCB-1242	Smpl.						=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly
NODI: -		NODI										
39504	PCB-1254	Smpl.						=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												

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			
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
39508	PCB-1260										
1 - Effluent Gross		Smpl.						=0	28 - ug/L	01/90 - Quarterly	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI									

Submission Note

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

Edit Check Errors

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

Comments

1. Pepco had planned to collect the third quarter stormwater samples in September, however, there was no qualifying storm event, and virtually no rain, in September. As a result, no sample could be collected. Pepco notified EPA on October 1, 2017 of missed compliance sampling in the third quarter and its plan to collect make up samples from the first qualifying storm event in October. Accordingly, make up samples were collected from the first qualifying storm event on October 9, and the results are reported on the third quarter (July-September 2017) DMRs. 2. NPDES Permit limits for Iron are 0.69 mg/l (monthly average) and 1 mg/l (daily max).

Attachments

Name	Type	Size
Stormeventmonitoring.pdf	pdf	89446

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2017-10-26 14:42 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2017-10-26 14:45 (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	10/09/2017	6	0.35	784
101	10/09/2017	6	0.35	784

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction for the October 9, 2017 Storm Event

**Banning Generating Station
Pollutant Load Percent Reduction
Washington, DC**

Outfall	Parameter	Sample Date	Concentration (mg/L) (a)	Average Flow (cfs) ¹⁰	Load (mg/hr)	Maximum Daily Limit (mg/L) (c)	Maximum Daily Discharge Concentration Goals for Metals (b)	Baseline Concentration (mg/L)	Source of Baseline Concentration ¹¹	Average Baseline Flow (cfs)	Baseline Load (mg/hr)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ¹²	Pollutant Concentration Reduction Compared with Baseline Concentration ¹³	Pollutant Load Concentration Compared with Baseline Load ¹⁴
013Q	TSS	10/9/2017	20	1.43	509.87	100	100	42	(b) Highest TSS discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Apr-Jun 2005.	4.82	5722	80%	52%	100%
013Q	Cadmium	10/9/2017	0.00034	1.43	0.0 ¹⁵	0.00465	0.0045	0.00075	(b) Reasonable potential analysis concentration for cadmium from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Apr-Jun 2005.	7.48	0.16	100%	100%	100%
013Q	Copper	10/9/2017	0.0059	1.43	0.24	0.01344	0.0134	0.064	(b) Highest copper discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Apr-Jun 2005.	3.14	5.7	50%	91%	99%
013Q	Iron	10/9/2017	0.96	1.43	0.0 ¹⁶	1.00	NA	5.90	(i) Highest iron discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Apr-Jun 2005.	0.148	24	100%	100%	100%
013Q	Nickel	10/9/2017	0.0012	1.43	0.0 ¹⁷	0.117 ¹⁸	0.117	0.056	(b) Reasonable potential analysis concentration for nickel from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Apr-Jun 2005.	0.148	0.23	100%	100%	100%
013Q	Lead	10/9/2017	0.005	1.43	0.0 ¹⁹	0.06458	0.0645	0.023	(b) Highest lead discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Apr-Jun 2005.	7.48	4.9	100%	100%	100%
013Q	Zinc	10/9/2017	0.0446	1.43	1.8	0.11718	0.117	0.9	(b) Highest zinc discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Apr-Jun 2005.	5.15	131	62%	95%	99%
013Q	PCB-1242	10/9/2017	<0.00093	1.43	0.0 ²⁰	No Discharge	NA	0	Quarterly DMRs for Outfall 013Q. PCB Analytes were not detected from 2005 to 2010.	NA ²¹	0 ²²	0%	0% ²³	0% ²⁴
013Q	PCB-1254	10/9/2017	<0.00093	1.43	0.0 ²⁵	No Discharge	NA	0	Quarterly DMRs for Outfall 013Q. PCB Analytes were not detected from 2005 to 2010.	NA ²⁶	0 ²⁷	0%	0% ²⁸	0% ²⁹
013Q	PCB-1280	10/9/2017	<0.00093	1.43	0.0 ³⁰	No Discharge	NA	0	Quarterly DMRs for Outfall 013Q. PCB Analytes were not detected from 2005 to 2010.	NA ³¹	0 ³²	0%	0% ³³	0% ³⁴
Manhole K	TSS	10/9/2017	77	0.21	458	Monitor Only	NA	41	Third Quarter 2011 DMR for Manhole K ³⁵ Flow was measured in September 2011.	0.223	259	NA	-88%	-77%
Manhole K	Cadmium	10/9/2017	0.00098	0.21	0.0 ³⁶	0.004 ³⁷	0.0075	0.0012	Third Quarter 2011 DMR for Manhole K ³⁸ Flow was measured in September 2011.	0.223	0.0078	100%	100%	100%
Manhole K	Copper	10/9/2017	0.1	0.21	0.595	0.0134 ³⁹	0.0134	0.093	Third Quarter 2011 DMR for Manhole K ⁴⁰ Flow was measured in September 2011.	0.223	0.59	-84%	-9%	-1%
Manhole K	Iron	10/9/2017	6.4	0.21	36.1	Monitor Only	NA	3.6	Third Quarter 2011 DMR for Manhole K ⁴¹ Flow was measured in September 2011.	0.223	24	NA	-88%	-56%
Manhole K	Nickel	10/9/2017	0.0746	0.21	0.445	0.117 ⁴²	0.117	0.09	Third Quarter 2011 DMR for Manhole K ⁴³ Flow was measured in September 2011.	0.223	0.57	36%	17%	22%
Manhole K	Lead	10/9/2017	0.178	0.21	1.058	0.0645 ⁴⁴	0.0645	0.13	Third Quarter 2011 DMR for Manhole K ⁴⁵ Flow was measured in September 2011.	0.223	0.82	-178%	-37%	-29%
Manhole K	Zinc	10/9/2017	0.277	0.21	1.85	0.117 ⁴⁶	0.117	0.57	Third Quarter 2011 DMR for Manhole K ⁴⁷ Flow was measured in September 2011.	0.223	3.6	-137%	51%	54%
Manhole K	PCB-1242	10/9/2017	<0.00093	0.21	0.0 ⁴⁸	No Discharge	NA	0.0 ⁴⁹	Third Quarter 2011 DMR for Manhole K ⁵⁰ Flow was measured in September 2011.	0.223	0 ⁵¹	NA	0% ⁵²	0% ⁵³
Manhole K	PCB-1254	10/9/2017	<0.00093	0.21	0.0 ⁵⁴	No Discharge	NA	0.0 ⁵⁵	Third Quarter 2011 DMR for Manhole K ⁵⁶ Flow was measured in September 2011.	0.223	0 ⁵⁷	NA	0% ⁵⁸	0% ⁵⁹
Manhole K	PCB-1280	10/9/2017	<0.00093	0.21	0.0 ⁶⁰	No Discharge	NA	0.0 ⁶¹	Third Quarter 2011 DMR for Manhole K ⁶² Flow was measured in September 2011.	0.223	0 ⁶³	NA	0% ⁶⁴	0% ⁶⁵

Sources: (a) Microbac, 2017. Third Quarter 2017 Analytical Results. Microbac Laboratories, Inc. (b) USEPA, 2006a. Authorization to Discharge Under the National Pollutant Discharge Elimination System Industrial Permit Number: DC0000094. United States Environmental Protection Agency. Effective July 19, 2009. (c) Maximum Daily Limit listed in the 2009 NPDES Permit

Notes: cfs - cubic feet per second mg/L - milligrams per liter mg/hr - milligrams per hour
NA - Not applicable

¹⁰ Pollutant concentration was not detected. Concentration used in pollutant load calculation is set to zero.
¹¹ Flow was measured when samples were collected.
¹² Data from the September 5, 2011 sampling event for Manhole K was established as the baseline load because it was the first sample collected after Manhole K was established as the baseline load and catchment area.
¹³ Sample could be collected from Manhole K. Flow was estimated based on the alarm intensity and catchment area.
¹⁴ No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Goals for Metals listed in Section VIII E of the 2009 NPDES Permit for Banning Generating Station.
¹⁵ Manhole K has no maximum daily limit for the constituent and is monitoring only. Value listed is the Maximum Daily Stormwater Discharge Concentration Goals for Metals listed in Section VIII E of the 2009 NPDES Permit for Banning Generating Station.
¹⁶ Positive values indicate that the October 9, 2017 concentrations are lower than the baseline concentrations.
¹⁷ There were no detections of PCB Analytes. Therefore, a baseline flow was not established. However, given that the concentration of PCB Analytes is zero, the load is also zero regardless of flow.
¹⁸ Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 013Q from 2005 to 2007. TSS was not reported on DMRs until 2008. Therefore, the baseline concentration for TSS is from the highest concentration listed on the July-Sep 2009 to 2010 DMRs for Outfall 013Q.

Prepared by: ASC 10/24/2017
Checked by: JAF 10/25/2017

10/ Q

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit

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

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

Report Dates & Status

Monitoring Period: From 07/01/17 to 09/30/17
Status: NetDMR Validated

DMR Due Date: 10/28/17

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	Units	of Analysis	Type

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type		
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3					
00400	pH	Smpl. 1 - Effluent Gross				=7.8		=7.8	12 - SU	0	01/90 - Quarterly	GR - GRAB	
Season: 0			Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -			NODI										
00530	Solids, total suspended	Smpl. 1 - Effluent Gross					=77	=77	19 - mg/L	0	01/90 - Quarterly	GR - GRAB	
Season: 0			Req.				Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB	
NODI: -			NODI										
00556	Oil & Grease	Smpl. 1 - Effluent Gross											
Season: 0			Req.				Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB	
NODI: -			NODI				B - Below Detection Limit/No Detection	B - Below Detection Limit/No Detection					
00980	Iron, total recoverable	Smpl. 1 - Effluent Gross					=6.4	=6.4	19 - mg/L	0	01/90 - Quarterly	GR - GRAB	
Season: 0			Req.				Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB	
NODI: -			NODI										
01027	Cadmium, total [as Cd]	Smpl. 1 - Effluent Gross					=0.99	=0.99	28 - ug/L	0	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]	Smpl. 1 - Effluent Gross					=100	=100	28 - ug/L	0	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]	Smpl. 1 - Effluent Gross					=178	=178	28 - ug/L	0	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]	Smpl. 1 - Effluent Gross					=74.8	=74.8	28 - ug/L	0	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]	Smpl. 1 - Effluent Gross					=277	=277	28 - ug/L	0	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	Smpl.					=0	=0		0			

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			
1 - Effluent Gross								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									
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.					=0.1357	=0.1357	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

1. Pepco had planned to collect the third quarter stormwater samples in September, however, there was no qualifying storm event, and virtually no rain, in September. As a result, no sample could be collected. Pepco notified EPA on October 1, 2017 of missed compliance sampling in the third quarter and its plan to collect make up samples from the first qualifying storm event in October. Accordingly, make up samples were collected from the first qualifying storm event on October 9, and the results are reported on the third quarter (July - September) DMRs. 2. Toxicity Acute testing requirement was met, therefore, no analysis was conducted.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-25 15:56 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-25 15:56 (Time Zone:-04:00)

201A

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit

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

Major: ☒
Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 201-A - INTERNAL MONITORING PT. 201

Permitted Feature: 201 - External Outfall

Report Dates & Status

Monitoring Period: From 07/01/17 to 09/30/17

DMR Due Date: 10/31/17

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
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00400	pH										
1 - Effluent Gross		Smpl.				=7.78		=7.78	12 - SU	0	01/90 - Quarterly GR - GRAB
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly GR - GRAB
NODI: -		NODI									
00530	Solids, total suspended										
1 - Effluent Gross		Smpl.				=27		=27	19 - mg/L	0	01/90 - Quarterly GR - GRAB
Season: 0		Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/90 - Quarterly GR - GRAB
NODI: -		NODI									
00556	Oil & Grease										
1 - Effluent Gross		Smpl.									
Season: 0		Req.					<=10 MO AVG	<=15 DAILY MX	19 - mg/L		01/90 - Quarterly GR - GRAB
NODI: -		NODI				8 - Below Detection Limit/No Detection		8 - Below Detection Limit/No Detection			
39496	PCB-1242										
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/90 - Quarterly GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly GR - GRAB
NODI: -		NODI									
39504	PCB-1254										
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/90 - Quarterly GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly GR - GRAB
NODI: -		NODI									
39508	PCB-1260										
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/90 - Quarterly GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly GR - GRAB
NODI: -		NODI									
50050	Flow, in conduit or thru treatment plant										
1 - Effluent Gross		Smpl.	=0.00285	=0.0116	03 - MGD		=0.00285	=0.0116	03 - MGD	0	01/90 - Quarterly ES - ESTIMA
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		01/90 - Quarterly ES - ESTIMA
NODI: -		NODI									

Submission Note

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

Edit Check Errors

No errors.

Comments

Pepco had planned to collect the third quarter sample in September, however, the Oil/Water Separator was taken out of service for maintenance and repair of the Skimmer assembly. As a result, no sample could be collected. The system was placed back in service in October. A makeup sample was collected on October 9. Sampling results are reported on the DMRs for monitoring period of July - September 2017.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-26 14:35 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-26 14:35 (Time Zone:-04:00)

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201B-Hydrostatic Testing of Tanks

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit**Permit ID:** DC0000094**Major:** **Permittee:** PEPCO Environment Management Services**Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019**Facility:** PEPCO - BENNING**Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019**Permitted Feature:** 201 - External Outfall**Discharge:** 201-B - HYDROSTATIC TESTING TANKS**Report Dates & Status****Monitoring Period:** From 07/01/17 to 09/30/17**DMR Due Date:** 10/31/17**Status:** NetDMR Validated**Considerations for Form Completion****Principal Executive Officer****First Name:** William**Last Name:** Sullivan**Title:** VP, Operations**Telephone:** 202-872-2942**No Data Indicator (NODI)****Form NODI:** -

Parameter		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		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			
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: 2017-10-13 16:45 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-13 16:45 (Time Zone:-04:00)

202A

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit**Permit ID:** DC0000094**Major:** **Permittee:** PEPCO Environment Management Services**Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019**Facility:** PEPCO - BENNING**Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019**Permitted Feature:** 202 - External Outfall**Discharge:** 202-A - COOLING TOWER BLOWDOWN**Report Dates & Status****Monitoring Period:** From 07/01/17 to 09/30/17**DMR Due Date:** 10/31/17**Status:** NetDMR Validated**Considerations for Form Completion**

Net Value of PCBs

Principal Executive Officer**First Name:** William**Last Name:** Sullivan**Title:** VP, Operations**Telephone:** 202-872-2942**No Data Indicator (NODI)****Form NODI:** -

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

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

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

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Report Last Signed By

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 E-Mail: fmahvi@pepco.com
 Date/Time: 2017-10-13 16:53 (Time Zone:-04:00)

202B

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit**Permit ID:** DC0000094**Major:** **Permittee:** PEPCO Environment Management Services**Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019**Facility:** PEPCO - BENNING**Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019**Permitted Feature:** 202 - External Outfall**Discharge:** 202-B - COOLING TOWER BASIN WASH WATER**Report Dates & Status****Monitoring Period:** From 07/01/17 to 09/30/17**DMR Due Date:** 10/31/17**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							

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
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Report Last Signed By

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Date/Time: 2017-10-13 16:55 (Time Zone:-04:00)

203A

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit**Permit ID:** DC0000094**Major:** ☒**Permittee:** PEPCO Environment Management Services**Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019**Facility:** PEPCO - BENNING**Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019**Permitted Feature:** 203 - External Outfall**Discharge:** 203-A - COOLING TOWER BLOW DOWN**Report Dates & Status****Monitoring Period:** From 07/01/17 to 09/30/17**DMR Due Date:** 10/31/17**Status:** NetDMR Validated**Considerations for Form Completion**

Net Value of PCBs

Principal Executive Officer**First Name:** William**Last Name:** Sullivan**Title:** VP, Operations**Telephone:** 202-872-2942**No Data Indicator (NODI)****Form NODI:** -

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

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

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

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 E-Mail: fmahvi@pepco.com
 Date/Time: 2017-10-13 16:58 (Time Zone:-04:00)

L03B

User: FARIBA12, Permittee User



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DMR Copy of Submission

Permit

Permit ID: DC0000094 **Major:** 

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

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

Permitted Feature: 203 - External Outfall **Discharge:** 203-B - COOLING TOWER BASIN WASH WATER

Report Dates & Status

Monitoring Period: From 07/01/17 to 09/30/17 **DMR Due Date:** 10/31/17

Status: NetDMR Validated

Considerations for Form Completion**Principal Executive Officer**

First Name: William **Last Name:** Sullivan

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

No Data Indicator (NODI)

Form NODI: -

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

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Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2017-10-13 17:01 (Time Zone:-04:00)

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

Annual Inspection of the Drainage System

The annual inspection of the drainage system was initially scheduled for September 2017, however, with the construction of stormwater treatment system underway; this inspection has been postponed until after the construction is completed.

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

Storm Drain Inlets Inspection Logs

The inspection logs for July - September 2017 are attached.

Weekly Inspection of Drain Guards 2017

Description		Normal Inspections		Comments		Inspection Date		Inspected by		Comments		Inspection Date		Inspected by		Comments	
Drain Number	Dispositions	Consent Type	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by	Comments
1	24"x36"	Drain guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
2	27"x27"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
3	27"x27"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
4	24"x24"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
5	24"x24"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
6	24"x24"	Drain guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
7	36"x63"	Drain guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
8	28" Round	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
9	24" Round	Heavy metal sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
10	24" Round	Heavy metal witch hat / sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
11	24" Round	Heavy metal witch hat / sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
12	24" Round	Heavy metal sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
13	47" Round	Heavy metal sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
14	70"x90"	Heavy metal sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
15	36"x40"	Heavy metal sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
16	36"x40"	Heavy metal sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
17	45"x45"	Heavy metal sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
18	31"x31"	Heavy metal sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
19	31"x31"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
20	27"x49"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
21	20" Round	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
22	18"x25"	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
23	30" Round	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
24	30" Round	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
25	30" Round	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
26	30" Round	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
27	24" Round	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
28	30" Round	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
29	24" Round	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
30	24" Round	Drain guard plus with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
31	24" Round	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
32	27"x27"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
33	27"x27"	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
34	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
35	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
36	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
37	27"x27"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
38	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
39	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
40	233" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
41	27"x27"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
42	27"x27"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
43	27"x27"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
44	27"x27"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
45	233" Long	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
46	27"x27"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
47	27"x27"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
48	24"x24"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
49	24"x24"	Heavy metal with sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
50	29"x32"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
51	64" Round	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
52	24" Round	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
53	145"x12"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
54	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
55	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
56	35"x35"	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
57	35"x35"	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
58	24" Round	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
59	59" Long	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
60	59" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
61	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
62	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
63	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
64	117" Long	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
65	24"x27"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
66	50"x45"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
67	24" Round	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
68	66" Long	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
69	70"x37"	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
70	70"x37"	Curb guard plus	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
71	24" Round	Curb guard plus / sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
72	24" Round	Curb guard plus / sock	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
73	37"x32"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
74	37"x32"	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK	8/21/2017	CV	Found OK	8/28/2017	CV	Found OK
75	24" Round	Heavy metal witch hat	8/7/2017	CV	Found OK	8/7/2017	CV	Found OK	8/14/2017	CV	Found OK						

Weekly Inspection of Drain Guards 2017

Drain Number	Description	Current Type	Inspected By	Comments	Inspected Date	Inspected By	Comments	Inspected Date	Inspected By	Comments
1	24"x36"	Drain guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
2	27"x27"	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
3	27"x27"	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
4	24"x24"	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
5	24"x24"	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
6	24"x24"	Drain guard plus	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
7	36"x63"	Drain guard plus	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
8	26" Round	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
9	24" Round	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
10	18" Round	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
11	24" Round	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
12	24" Round	Heavy metal witch hat	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
13	42" Round	Heavy metal sock	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
14	70"x50"	Drain guard plus	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
15	70"x50"	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
16	45"x45"	Heavy metal sock	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
17	45"x45"	Heavy metal sock	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
18	31"x31"	Heavy metal sock	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
19	31"x31"	Heavy metal sock	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
20	27"x40"	Heavy metal with sock	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
21	30" Round	Heavy metal with sock	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
24	18"x25"	Drain guard plus with sock	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
25	30" Round	Drain guard plus with sock	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
28	30" Round	Drain guard plus with sock	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
29	24" Round	Drain guard plus with sock	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
30	24" Round	Drain guard plus with sock	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
33	24" Round	Heavy metal with sock	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
38	117" Long	Heavy metal with sock	HOUDAY	Found Ok	9/11/2017	CV	Found Ok	9/11/2017	CV	Found Ok
39	117" Long	Curb guard plus	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
40	233" Long	Curb guard plus	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
42	27"x27"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
43	27"x27"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
44	27"x27"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
45	233" Long	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
46	27"x27"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
47	27"x27"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
48	24"x24"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
49	145"x12"	sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
50	25"x32"	Heavy metal witch hat	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
51	24"x42"	Heavy metal witch hat	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
52	24"x42"	Heavy metal witch hat	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
53	145"x12"	Heavy metal with hat	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
54	117" Long	Curb guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
55	117" Long	Curb guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
56	35"x35"	Heavy metal with sock	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
57	24" Round	Heavy metal witch hat	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
58	35"x35"	Heavy metal witch hat	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
60	59" Long	Curb guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
61	117" Long	Curb guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
62	117" Long	Curb guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
63	117" Long	Curb guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
64	117" Long	Curb guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok
65	24"x27"	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
66	50"x45"	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
67	24" Round	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
68	66" Long	Curb guard plus	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
69	70"x37"	Heavy metal with sock	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
70	70"x37"	Curb guard plus	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
71	70"x37"	Curb guard plus	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
72	24" Round	Curb guard plus /s	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
73	32"x32"	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
74	32"x32"	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
75	24" Round	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
76	32"x32"	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
77	35"x35"	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
78	35"x35"	Heavy metal witch hat	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
79	14"x14"	Curb guard plus	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
80	24" Round	Heavy metal witch hat	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
81	10"x18"	Heavy metal witch hat	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
82	19"x19"	Heavy metal witch hat	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
83	19"x19"	Heavy metal witch hat	CV	Found Ok	9/15/2017	CV	Found Ok	9/15/2017	CV	Found Ok
85	10"x18"	Heavy metal drain guard	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
86	19"x19"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
87	19"x19"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
88	20"x20"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
89	48"x36"	Heavy metal with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
90	8" round	Curb guard plus with sock	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
91	18"x18"	Inlet guard	CV	Found Ok	9/12/2017	CV	Found Ok	9/12/2017	CV	Found Ok
97	24"x31	Inlet guard	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
98	70"x37"	Heavy metal guard with boom	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
99	48"x40"	Heavy metal guard with boom	CV	Found Ok	9/14/2017	CV	Found Ok	9/14/2017	CV	Found Ok
100	24"x11	Heavy metal boom curb guard plus	CV	Found Ok	9/13/2017	CV	Found Ok	9/13/2017	CV	Found Ok

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

Monthly Inspections

The site-wide inspection logs for July - September 2017 are attached. Any corrective actions required in response to findings noted on the inspection logs are discussed with the responsible operating area and followed up during the next rounds of site inspections to make sure they are corrected. For example, any housekeeping issues such as weed control and lawn maintenance are brought to the attention of Facility Operations staff for their follow up.

Transformer Storage Shed - Construction was completed by December 31, 2016 and the facility was placed in operation. See Pepco's July 31, 2017 quarterly reports to EPA.

July 2017

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Inspection Date: 7-24-17
Inspector: Terry McGraw

Inspection Time: 10:00 AM
Inspector's Signature: [Signature]



	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Good Housekeeping Procedures											
Are outside work areas clean, dry, and free of litter and debris?	✓		✓		✓		✓		✓		
Is the grass and plants properly maintained in the area?		X	✓		✓		✓		✓		Weed need pull up & grass cut contact Facility
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?		✓		✓		✓		✓		✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?		✓		✓		✓		✓		✓	
Are there signs of drainage issue or overflow at any storm drain inlet?	✓		✓		✓		✓		✓		DRAINING 06-08 NEED TO GO FIX OR REPLACE CALL CLEAN VENTURE
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		X		✓		Bldg 75 steel plate on drain NEED REPAIR CONTACT FACILITY
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		



Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Terry Mares
7-24-17
10:00 AM

	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.?	✓		✓		✓		✓		✓		

July 2017

Pepco – Benning Road Facility
Bulk Storage Monthly Inspection Report

Inspection Date: 7-24-17Inspection Time: 10:00 AMInspector: Terry MannInspector's Signature: Terry Mann

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

August 2017

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Inspection Date: 8-16-17

Inspection Time: 1030 AM

Inspector: Terry Morrow

Inspector's Signature: Terry Morrow

Good Housekeeping Procedures

Are outside work areas clean, dry, and free of litter and debris?

Is the grass and plants properly maintained in the area?

Is the area free of potential discharges of leaks and spills?

Are containment areas in good condition, with valves closed?

Are drums labeled and stored on proper containment?

Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?

Are catch basins and storm drain inlets in the area to the storm drain system free from debris?

Are booms in place and in good condition at catch basins and other inlets to the storm drain system?

Are catch basins in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?

Are there signs of drainage issue or overflow at any storm drain inlet?

Spill Prevention & Response

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

Do spill kits contain the proper tools and equipment?

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Are outside work areas clean, dry, and free of litter and debris?	✓				✓		✓		✓		
Is the grass and plants properly maintained in the area?	✓		✓		✓		✓		✓		Fence Poles Concrete block NEED TO BE PICK UP CONTACTED Facility
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		WOOD & GRASS HAS BEEN CLEAN UP
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?		✓		✓		✓		✓		✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are catch basins 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?		✓		✓		✓		✓		✓	DRAINS 06 & 08 NEED TO BE FIX CONTACTED CLEAN VAN
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?	✓		✓		✓		✓		✓		

OR REPLACE



Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Have all spills been properly cleaned up and disposed of properly in the respective area?	✓		✓		✓		✓		✓		
Structural Control Devices											
Has the vehicle wash catch basin been inspected for sediment build-up?	✓		✓		✓		✓		✓		
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.?	✓		✓		✓		✓		✓		

14774 MARKED
8-16-17
1038

August 2017

Pepco – Benning Road Facility
Bulk Storage Monthly Inspection Report

Inspection Date: 8-16-17Inspection Time: 10:30 AMInspector: Terry McNameeInspector's Signature: Terry McNamee

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

September 2017

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Inspection Date: 9-13-17 Inspection Time: 800 AM
Inspector: Terry Morrow Inspector's Signature: [Signature]



	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Good Housekeeping Procedures											
Are outside work areas clean, dry, and free of litter and debris?	✓				✓		✓		✓		Fence Poles & concrete block has been cleaned up
Is the grass and plants properly maintained in the area?	✓				✓		✓		✓		
Is the area free of potential discharges of leaks and spills?	✓				✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓				✓		✓		✓		
Are drums labeled and stored on proper containment?	✓				✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?	✓				✓		✓		✓		
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓				✓		✓		✓		
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓				✓		✓		✓		
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓				✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		X			✓		✓		✓		Drains 06-08 still being fixed or replaced
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

Terry Maxco
9-13-17
800 AM

	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.?	✓		✓		✓		✓		✓		

SEPTEMBER 2017

Pepco – Benning Road Facility Bulk Storage Monthly Inspection Report

Inspection Date: 9-13-17

Inspection Time: 800 AM

Inspector: Terry Mann

Inspector's Signature: Terry Mann



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

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

Status of Stormwater Treatment System Design and Construction

During this past quarter, Pepco has continued to make progress on permitting, contracting, and construction of the Storm Water Treatment System, as summarized below.

Permitting Activities:

As noted in the previous quarterly report, the process of obtaining the required construction permit from the District of Columbia Department of Consumer and Regulatory Affairs (DCRA) took substantially longer than anticipated despite diligent efforts by Pepco and its design consultant, AECOM. The District of Columbia Department of Energy and the Environment (DOEE), which is the lead District of Columbia agency for the permit review, approved the 100% final civil design plan on August 3, 2017. To expedite the issuance of the final construction permit for the project, the approved plan was hand delivered to DCRA on the same day and the permit was issued on August 3, 2017 as well.

Contracting Activities:

Pepco and AECOM proceeded with the process of selecting a construction contractor in July and August. The additional information requested from the prospective bidders after submittal of their original bids was thoroughly reviewed. Pepco awarded the construction contract to Flipco Construction Company at a contract price of \$4.56 Million on August 22.

Construction Activities:

Flipco Construction mobilization and site preparation commenced on September 5.

A pre-construction meeting was held with DOEE Construction and Maintenance Inspection and Enforcement Branch on September 8 to review and discuss the approved design, project schedule, sediment and erosion plan during the construction activities, and required notifications and submittals to DOEE.

Flipco has worked diligently with Contech Engineering on ordering and delivery of the stormwater filtration units and prefabricated vaults. (The initial schedule for ordering the equipment was delayed due to DOEE prolonged process of approving the 100% civil design.)

Flipco started the site construction work on September 11. The construction is in progress as summarized below:

Hot Spot 1- Transformer Test Shop

- Installation of 4 downspout Stormfilter units was completed by September 19.
- Installation of flow splitter manholes and associated piping around the transformer shop area is in progress; awaiting Contech equipment delivery by mid-October.

Other Hot Spots

- Test pitting and survey of electric, water and sanitary sewer lines are being conducted by a third party contractor at other hotspot locations to determine the existing utilities depths/elevations before the construction work begin in those areas.

Flippo has assigned multiple crews to the job to compensate for the delayed start-up in order to complete the construction on schedule by December 31, 2017.

DOEE Construction and Maintenance Enforcement Branch has been inspecting the site on a weekly basis, providing oversight on sediment and erosion control measures and related maintenance activities.

Pepco holds weekly status meetings with AECOM and Flippo to discuss and review all pertinent project information with the team.

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

Stormwater Management Training

No employee received training during the prior quarter.

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

Stormwater Pollution Prevention Plan

An updated plan was submitted to EPA on June 14, 2017. To-date, no further update has been made to the plan.

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

Change in Management Responsibilities

There was no change in management responsibilities for the period of July-September 2017.

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

Status of Completion of Transformer Storage Shed

The construction of Transformer Storage Shed was completed by December 31, 2016. See Pepco's July 31, 2017 quarterly reports to EPA.

Paragraph 68.a.(10) of the consent decree

Status of Stormwater Retention Project

In accordance with Paragraph 55 of the consent decree, Pepco submitted the Stormwater Retention Project Plan to EPA on June 30, 2017. EPA approved the plan including the 60% design on August 31, 2017. Pepco is working with Princeton Hydro to complete the design work and then will solicit bids for Project construction. The Project remains on schedule for completion by June 30, 2018, in accordance with Paragraph 54 of the Consent Decree.

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

Description of Non-Compliance

There were exceedances of average monthly limits for Copper and Iron in a grab sample collected on October 9, 2017 from Outfall 013 (see note below). The permit daily max limit for Copper is 13.4 ug/l and monthly average is 0.005 ug/l. The sampling result showed 0.0059 ug/l. The permit daily max for Iron is 1 mg/l and monthly average is 0.69 mg/l. The sampling result showed 0.96 mg/l. Pepco continues to implement the on-going corrective measures at the facility and maintain good housekeeping practices. The construction of stormwater treatment system is currently in progress (see paragraph 68.a.5 for status of system design and construction). This system will provide sufficient treatment to achieve and maintain compliance with metal effluent limits. In the interim, it was understood that existing control measures may not be effective to meet all permit limits. For that reason, the Consent Decree established interim effluent targets below which no stipulated penalties would be assessed for permit exceedances. See Paragraph 78.b and Appendix B. The sampling results were all well below the target levels specified in Appendix B.

Note - As reported to EPA on October 1, 2017, Pepco had planned to collect the third quarter compliance samples in September, however, the samples could not be collected as planned and make-up samples were collected on October 9, 2017 for the reasons explained below:

- Stormwater samples: There was no qualifying storm event and virtually no rain in September. As a result no sample could be collected from Outfalls 013 and 101 before the end of the third quarter. Pepco collected make-up samples on October 9 during the first qualifying storm event of the fourth quarter, and the results of this sampling are reported on the DMRs for monitoring period of July-September 2017.
- Sample from internal monitoring point 201: the oil/water separator was taken out of service for maintenance and repair of skimmer assembly in September. Therefore, no sample could be collected. The system was placed back in service in October. Pepco collected a make-up sample on October 9, and the results of this sampling are reported on the DMR for monitoring period of July-September 2017.

