

Via Electronic and US Mail - 7011 1150 0001 6024 0113

October 26, 2018

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

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

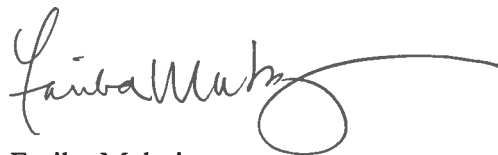
Dear Ms. Hopkins,

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

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

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

Sincerely,



Fariba Mahvi
Sr. Project Manager
Environmental Services

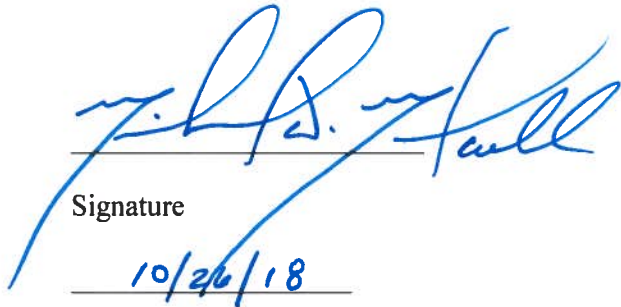
Attachments

CERTIFICATION STATEMENT

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

Michael W. Maxwell

Vice President, Support Services



Signature

Date

10/26/18

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

Discharge Monitoring Reports

Copies of DMRs for July - September 2018 are attached.

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 07/01/18 to 07/31/18
Status: **NetDMR Validated**

DMR Due Date: 08/28/18

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH											
1 - Effluent Gross		Smpl.				=7.8		=7.8	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.				=6.4		=6.4	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.				=8.2		=8.2	19 - mg/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.				<=15 MO AVG		<=20 DAILY MX	19 - mg/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39496	PCB-1242											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39504	PCB-1254											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
39508	PCB-1260											
1 - Effluent Gross		Smpl.						=0	28 - ug/L	0	01/DS - Once Per Discharge	GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI										
50050	Flow, in conduit or thru treatment plant											
1 - Effluent Gross		Smpl.	=0.00392	=0.00392	03 - MGD	=0.00392		=0.00392	03 - MGD	0	01/DS - Once Per Discharge	MS - MEASRD
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	Req Mon MO AVG		Req Mon DAILY MX	03 - MGD		01/DS - Once Per Discharge	MS - MEASRD
NODI: -		NODI										

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-08-16 13:40 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-08-16 13:40 (Time Zone:-04:00)

©2008 NetDMR

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 08/01/18 to 08/31/18
Status: **NetDMR Validated**

DMR Due Date: 09/28/18

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942 

No Data Indicator (NODI)

Form NODI: -

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

Parameter 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/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI				C - No Discharge		C - No Discharge			
00530	Solids, total suspended	Smpl.									
	1 - Effluent Gross										
Season: 0		Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
00556	Oil & Grease	Smpl.									
	1 - Effluent Gross										
Season: 0		Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI					C - No Discharge	C - No Discharge			
39496	PCB-1242	Smpl.									
	1 - Effluent Gross										
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI						C - No Discharge			
39504	PCB-1254	Smpl.									
	1 - Effluent Gross										
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI						C - No Discharge			
39508	PCB-1260	Smpl.									
	1 - Effluent Gross										
Season: 0		Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -		NODI						C - No Discharge			
50050	Flow, in conduit or thru treatment plant	Smpl.									
	1 - Effluent Gross										
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	01/DS - Once Per Discharge	MS - MEASRD
NODI: -		NODI	C - No Discharge	C - No Discharge			C - No Discharge	C - No Discharge			

Submission Note

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

Edit Check Errors

No errors.

Comments

There was no discharge to internal monitoring Point 003 during August 2018.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-09-17 09:16 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-09-17 09:16 (Time Zone:-04:00)

©2008 NetDMR

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 09/01/18 to 09/30/18
Status: **NetDMR Validated**

DMR Due Date: 10/28/18

Considerations for Form Completion

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Parameter 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/DS - Once Per Discharge	GR - GRAB
NODI: -	NODI				C - No Discharge		C - No Discharge			
00530 Solids, total suspended	Smpl.									
1 - Effluent Gross										
Season: 0	Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -	NODI					C - No Discharge	C - No Discharge			
00556 Oil & Grease	Smpl.									
1 - Effluent Gross										
Season: 0	Req.					<=15 MO AVG	<=20 DAILY MX	19 - mg/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -	NODI					C - No Discharge	C - No Discharge			
39496 PCB-1242	Smpl.									
1 - Effluent Gross										
Season: 0	Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -	NODI						C - No Discharge			
39504 PCB-1254	Smpl.									
1 - Effluent Gross										
Season: 0	Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -	NODI						C - No Discharge			
39508 PCB-1260	Smpl.									
1 - Effluent Gross										
Season: 0	Req.						<=1 DAILY MX	28 - ug/L	01/DS - Once Per Discharge	GR - GRAB
NODI: -	NODI						C - No Discharge			
50050 Flow, in conduit or thru treatment plant	Smpl.									
1 - Effluent Gross										
Season: 0	Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	01/DS - Once Per Discharge	MS - MEASRD
NODI: -	NODI	C - No Discharge	C - No Discharge			C - No Discharge	C - No Discharge			

Submission Note

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

Edit Check Errors

No errors.

Comments

There was no discharge from the oil/water separator to monitoring point 003 in September 2018.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 15:36 (Time Zone: -04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 15:37 (Time Zone: -04:00)

©2008 NetDMR

Permit

Permit ID: DC0000094 **Major:** ☒
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
 WASHINGTON, DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
 WASHINGTON, DC20019
Permitted Feature: 013 - External Outfall **Discharge:** 013-A - BNON COOLING WATER BLOWDOWN

Report Dates & Status

Monitoring Period: From 07/01/18 to 08/31/18 **DMR Due Date:** 09/28/18
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.	=0.00233	=0.01545	03 - MGD					0	01/60 - Once Every 2 Months	ES - ESTIMA
1 - Effluent Gross												
Season: 0		Req.	Req Mon MO AVG	Req Mon DAILY MX	03 - MGD						01/60 - Once Every 2 Months	ES - ESTIMA
NODI: -		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 completed in compliance with the permit condition. Therefore, no sampling was conducted.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-09-20 11:04 (Time Zone: -04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-09-20 11:05 (Time Zone: -04:00)

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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-Q - No Blowdown**Report Dates & Status****Monitoring Period:** From 07/01/18 to 09/30/18**DMR Due Date:** 10/28/18**Status:** **NetDMR Validated****Considerations for Form Completion**

NO BLOWDOWN

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

Parameter		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.			=8.23		=8.23	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									
X 00530	Solids, total suspended										
1 - Effluent Gross		Smpl.				=38	=38	19 - mg/L	1	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
00556	Oil & Grease										
1 - Effluent Gross		Smpl.				<5.3	<5.3	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]										
1 - Effluent Gross		Smpl.				<0.25	<0.25	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				<=2.08 MO AVG	<=4.95 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
01042	Copper, total [as Cu]										
1 - Effluent Gross		Smpl.				=4.4	=4.4	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				<=5.24 MO AVG	<=13.44 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
X 01045	Iron, total [as Fe]										
1 - Effluent Gross		Smpl.				=0.26	=0.26	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				<=.69 MO AVG	<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
01051	Lead, total [as Pb]										
1 - Effluent Gross		Smpl.				=3.6	=3.6	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				<=56.6 MO AVG	<=64.58 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
01092	Zinc, total [as Zn]										
1 - Effluent Gross		Smpl.				=32.9	=32.9	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				<=73.11 MO AVG	<=117.18 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
39496	PCB-1242										
1 - Effluent Gross		Smpl.					=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.					<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
39504	PCB-1254										
1 - Effluent Gross		Smpl.					=0	28 - ug/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.					<=1 DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB

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		
NODI: -		NODI									
39508	PCB-1260	Smpl.						=0	28 - ug/L	0	01/90 - Quarterly
1 - Effluent Gross											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)	✓
00530	Solids, total suspended	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	✓

Comments

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

Attachments

Name	Type	Size
AttachmentsSeptember2018pdf.pdf	pdf	67327

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-10-10 10:36 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-10-10 10:36 (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	9/07/2018	9	2.89	141

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction for September 7, 2018 Storm Event

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

Outfall	Parameter	Sample Date	Concentration (mg/L) (a)	Average Flow (cfs) ^(b)	Load (mg/d)	Maximum Daily Discharge Concentration (mg/L) (c)	Maximum Daily Stormwater Discharge Concentration Goals for Metals (b)	Baseline Concentration (mg/L)	Source of Baseline Concentration ^(a)	Average Baseline Flow (cfs)	Baseline Load (mg/d)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ^(c)	Pollutant Concentration Reduction Compared with Baseline Concentration (b)	Pollutant Load Concentration Compared with Baseline Load ^(b)
0130	TSS	9/7/2018	36	7.89	8490.00	100	100	42	(b) Highest TSS discharge concentration from DMR data. Quarterly stormwater DMR data for Oct-Dec 2010. TSS was not reported on DMRs prior to Jul-Sep 2009. Flow was measured in 2009.	4.82	5732	62%	10%	-48%
0130	Cadmium	9/7/2018	<0.000250	7.89	0.0 ⁽¹⁾	0.00495	0.0045	0.00075	(b) Reasonable potential analysis concentration for cadmium.	7.48	0.16	100%	100%	100%
0130	Copper	9/7/2018	0.0044	7.89	0.98	0.01344	0.0134	0.064	(b) Highest copper discharge concentration from DMR data for Outfall 0130. Quarterly stormwater DMR data for Jul-Sep 2005.	3.14	5.7	67%	93%	83%
0130	Iron	9/7/2018	0.26	7.89	56.06	1.00	NA	5.80	(f) Highest iron discharge concentration from DMR data for Outfall 0130. Quarterly stormwater DMR data for Jul-Sep 2005.	0.148	24	74%	96%	-130%
0130	Nickel	9/7/2018	0.0025	7.89	0.56	0.117 ^(d)	0.117	0.056	(b) Reasonable potential analysis concentration for nickel.	0.146	0.23	96%	98%	-130%
0130	Lead	9/7/2018	0.0036	7.89	0.80	0.05458	0.0545	0.023	(f) Highest lead discharge concentration from DMR data for Outfall 0130. Quarterly stormwater DMR data for Jan-Mar 2006.	7.48	4.9	94%	94%	83%
0130	Zinc	9/7/2018	0.0329	7.89	7.4	0.11718	0.117	0.9	(b) Highest zinc discharge concentration from DMR data for Outfall 0130. Quarterly stormwater DMR data for Apr-Jun 2005.	5.15	131	72%	96%	94%
0130	PCB-1242	9/7/2018	<0.00093	7.89	0.0 ⁽¹⁾	No Discharge	NA	0	Quarterly DMRs for Outfall 0130. PCB. Arsenics were not detected from 2005 to 2010.	NA ^(b)	0 ^(b)	0%	0% ⁽¹⁾	0% ⁽¹⁾
0130	PCB-1254	9/7/2018	<0.00093	7.89	0.0 ⁽¹⁾	No Discharge	NA	0	Quarterly DMRs for Outfall 0130. PCB. Arsenics were not detected from 2005 to 2010.	NA ^(b)	0 ^(b)	0%	0% ⁽¹⁾	0% ⁽¹⁾
0130	PCB-1260	9/7/2018	<0.00093	7.89	0.0 ⁽¹⁾	No Discharge	NA	0	Quarterly DMRs for Outfall 0130. PCB. Arsenics were not detected from 2005 to 2010.	NA ^(b)	0 ^(b)	0%	0% ⁽¹⁾	0% ⁽¹⁾

Sources:
(a) Microbac, 2016. Third Quarter 2018 Sample Analytical Results. Microbac Laboratories, Inc.
(b) USEPA, 2008a. Authorization to Discharge under the National Pollutant Discharge Elimination System Industrial Permit Number: DCO000094. 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/d - milligrams per second
NA - Not applicable

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

⁽²⁾ Flow was measured with pumps were collected.

⁽³⁾ Data from the September 5, 2011 sampling event for Manhole K. Flow was estimated based on the storm intensity and catchment area.

⁽⁴⁾ 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 Brenning Generating Station.

⁽⁵⁾ 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 Brenning Generating Station.

⁽⁶⁾ Positive values indicate that the September 2018 concentrations are lower than the maximum daily limit for the pollutants.

⁽⁷⁾ There were no detections of PCB Arsenics. Therefore, a baseline flow was not established. However, given that the concentration of PCB Arsenics is zero, the load is also zero regardless of flow.

⁽⁸⁾ Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 0130 from 2005 to 2007. TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2009 to 2010 DMRs for Outfall 0130.

Prepared by: ASC 10/4/18
Checked by: JAF 10/5/18

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 07/01/18 to 09/30/18
Status: **NetDMR Validated**

DMR Due Date: 10/28/18

Considerations for Form Completion

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

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Parameter 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.				=7.6		=7.8	12 - SU	01/90 - Quarterly	GR - GRAB
	1 - Effluent Gross										
	Season: 0	Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU	01/90 - Quarterly	GR - GRAB
	NODI: -	NODI									
00530	Solids, total suspended	Smpl.					=175	=250	19 - mg/L	01/90 - Quarterly	GR - GRAB
	1 - Effluent Gross										
	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.					<5.35	<5.4	19 - mg/L	01/90 - Quarterly	GR - GRAB
	1 - Effluent Gross										
	Season: 0	Req.					Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L	01/90 - Quarterly	GR - GRAB
	NODI: -	NODI									
00980	Iron, total recoverable	Smpl.					=3.94	=7	19 - mg/L	01/90 - Quarterly	GR - GRAB
	1 - Effluent Gross										
	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.					=0.55	=0.732	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									
01042	Copper, total [as Cu]	Smpl.					=83.75	=116	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									
01051	Lead, total [as Pb]	Smpl.					=79.25	=117	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									
01067	Nickel, total [as Ni]	Smpl.					=70.55	=118	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									
01092	Zinc, total [as Zn]	Smpl.					=208	=293	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									
39496	PCB-1242	Smpl.					=0	=0	28 - ug/L	01/90 - Quarterly	GR - GRAB
	1 - Effluent Gross										
	Season: 0	Req.									

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2 Req Mon MO AVG	Value 3 Req Mon DAILY MX			
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.					=0.335	=0.4	03 - MGD	01/90 - Quarterly	ES - ESTIMA
1 - Effluent Gross											
Season: 0		Req.					Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	01/90 - Quarterly	ES - ESTIMA
NODI: -		NODI									
TS000	Toxicity, Acute	Smpl.									
1 - Effluent Gross											
Season: 0		Req.					Req Mon MO AVG	Req Mon DAILY MX	2F - tox acute	01/5Y - Once Every 5 Years	24 - COMP24
NODI: -		NODI					E - Analysis Not Conducted/No Sample	E - Analysis Not Conducted/No Sample			

Submission Note

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

Edit Check Errors

No errors.

Comments

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

Attachments

Name	Type	Size
AttachmentsAugustSeptember.pdf	pdf	99208

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-10-10 12:23 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2018-10-10 12:24 (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 (hours)
101	8/21/2018	13	2.22	217
101	9/17/2018	11	1.26	183

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction for August 21 and September 17, 2018 Storm events

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

Outfall	Parameter	Sample Date	Concentration (mg/L) (a)	Average Flow (cfs) (a)	Load (mg/s) (a)	Maximum Daily Limit (mg/L) (e)	Maximum Daily Stormwater Discharge Concentration Goals for Metals (g)	Baseline Concentration (mg/L)	Source of Baseline Concentration ⁽¹⁰⁾	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ⁽⁷⁾	Pollutant Concentration Reduction Compared with Baseline Concentration (e)	Pollutant Load Concentration Compared with Baseline Load (e)
Manhole K	TSS	9/21/2018	250	0.62	4369	Monitor Only	NA	41	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	259	NA	-510%	-155%
Manhole K	Cadmium	9/21/2018	0.000723	0.62	0	0.0046 ^(b)	0.0075	0.0012	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	0.0076	84%	39%	-70%
Manhole K	Copper	9/21/2018	0.116	0.62	2.037	0.0134 ^(b)	0.0134	0.083	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	0.59	-766%	-25%	-247%
Manhole K	Iron	9/21/2018	7	0.62	122.9	Monitor Only	NA	3.8	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	24	-1528%	-84%	-412%
Manhole K	Nickel	9/21/2018	0.118	0.62	2.072	0.117 ^(d)	0.117	0.09	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	0.57	-1%	-31%	-265%
Manhole K	Lead	9/21/2018	0.117	0.62	2.064	0.0646 ^(b)	0.0645	0.13	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	0.82	-81%	10%	-150%
Manhole K	Zinc	9/21/2018	0.293	0.62	5.14	0.117 ^(d)	0.117	0.57	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	3.6	-150%	49%	-43%
Manhole K	PCB-1242	9/21/2018	<0.469	0.62	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	0 ^(b)	NA	0% ⁽¹⁾	0% ⁽¹⁾
Manhole K	PCB-1254	9/21/2018	<0.469	0.62	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	0 ^(b)	NA	0% ⁽¹⁾	0% ⁽¹⁾
Manhole K	PCB-1260	9/21/2018	<0.469	0.62	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾	Third Quarter 2011 DMR for Manhole K ⁽¹⁴⁾ Flow was measured in September 2011	0.223	0 ^(b)	NA	0% ⁽¹⁾	0% ⁽¹⁾

Prepared by ASC 10/4/18
Checked by JAF 10/5/18

Sources:
(a) Microbac, 2018. August 2018 Sample Analytical Results. Microbac Laboratories, Inc.
(b) USEPA, 2008a. Authorization to Discharge under the National Pollutant Discharge Elimination System Industrial Permit Number D000000004. United States Environmental Protection Agency. Effective July 19, 2009.
(c) Maximum Daily Limit listed in the 2008 NPDES Permit

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

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

(2) Flow was measured when samples were collected.

(3) Maximum Daily Limit for PCBs is 0.000001 mg/L.

(4) Data for 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 refilled. The retrofit was performed so that a representative sample could be collected from Manhole K. Flow was estimated based on the storm intensity and catchment area.

(5) No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Goals for Metals listed in Section VIII E of the 2008 NPDES Permit for Banning Generating Station.

(6) Manhole K has no maximum daily limit for the constituent and is monitoring only. Value listed is the Maximum Daily Stormwater Discharge Concentration Goals for Metals listed in Section VIII E of the 2008 NPDES Permit for Banning Generating Station.

(7) Positive values indicate that the August 2018 concentrations are lower than the maximum daily limit for the pollutants.

(8) Positive values indicate that the August 2018 concentrations are lower than the baseline concentrations.

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

(10) Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 0130 from 2005 to 2007. TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2008 to 2010 DMRs for Outfall 0130.

Banning Generating Station
Pollutant Load Percent Reduction
Washington, DC

Outfall	Parameter	Sample Date	Concentration (mg/L) (a)	Average Flow (cfs) ¹²	Load (mg/s)	Maximum Daily Limit (mg/L) (c)	Maximum Daily Stormwater Discharge Concentration Goals for Metals (b)	Baseline Concentration (mg/L)	Source of Baseline Concentration ⁽¹⁰⁾	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ⁽¹⁾	Pollutant Concentration Reduction Compared with Baseline Concentration ⁽¹⁾	Pollutant Load Concentration Compared with Baseline Load ⁽¹⁾
Manhole K	TSS	9/17/2018	100	0.42	1189	Monitor Only	NA	41	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	259	NA	-144%	-359%
Manhole K	Cadmium	9/17/2018	0.000375	0.42	0	0.0045 ^(d)	0.0075	0.0012	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	0.0076	92%	69%	41%
Manhole K	Copper	9/17/2018	0.0515	0.42	0.612	0.0134 ^(d)	0.0134	0.063	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	0.58	-284%	45%	-4%
Manhole K	Iron	9/17/2018	0.86	0.42	10.5	Monitor Only	NA	3.8	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	24	-105%	77%	56%
Manhole K	Nickel	9/17/2018	0.0231	0.42	0.275	0.117 ^(d)	0.117	0.09	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	0.57	80%	74%	52%
Manhole K	Lead	9/17/2018	0.0415	0.42	0.494	0.0645 ^(d)	0.0645	0.13	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	0.82	36%	68%	40%
Manhole K	Zinc	9/17/2018	0.123	0.42	1.46	0.117 ^(d)	0.117	0.57	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	3.6	-5%	78%	59%
Manhole K	PCB-1242	9/17/2018	<0.472	0.42	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	0 ⁽¹⁾	NA	0% ⁽¹⁾	0% ⁽¹⁾
Manhole K	PCB-1254	9/17/2018	<0.472	0.42	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	0 ⁽¹⁾	NA	0% ⁽¹⁾	0% ⁽¹⁾
Manhole K	PCB-1260	9/17/2018	<0.472	0.42	0.0 ⁽¹⁾	No Discharge	NA	0.0 ⁽¹⁾	Third Quarter 2011 DMR for Manhole K ⁽¹¹⁾ Flow was measured in September 2011	0.223	0 ⁽¹⁾	NA	0% ⁽¹⁾	0% ⁽¹⁾

Baselines:
(a) Microbac, 2018, Third Quarter 2018 Sample Analytical Results, Microbac Laboratories, Inc.
(b) USEPA, 2006a, Authorization to Discharge Under the National Pollutant Discharge Elimination System Industrial Permit Number: DC00000094, United States Environmental Protection Agency, Effective July 19, 2006.
(c) Maximum Daily Limit listed in the 2009 NPDES Permit

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

(1) Pollutant concentration was not detected. Concentration used in pollutant load calculation is set to zero.
(2) Flow was measured when samples were collected.
(3) Data from the September 15, 2018 NPDES permit for Manhole K was established as the baseline load because it was the first sample collected after Manhole K was retrofitted. The retrofit was performed so that a representative 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.
(4) 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.
(5) Positive values indicate that the September 2018 concentrations are lower than the maximum daily limit for the pollutants.
(6) Positive values indicate that the September 2018 concentrations are lower than the baseline concentrations.
(7) There were no detections of PCBs. Therefore, a baseline flow was not established. However, given that the concentration of PCBs is zero, the load is also zero regardless of flow.
(8) Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 0130 from 2005 to 2007. TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2009 to 2010 DMRs for Outfall 0130.

Permit

Permit ID: DC0000094 **Major:** ☒
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Permitted Feature: 201 - External Outfall **Discharge:** 201-A - INTERNAL MONITORING PT. 201

Report Dates & Status

Monitoring Period: From 07/01/18 to 09/30/18 **DMR Due Date:** 10/31/18
Status: **NetDMR Validated**

Considerations for Form Completion

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

Principal Executive Officer

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

No Data Indicator (NODI)

Form NODI: -

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

Parameter		NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type	
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH	Smpl.				=7.58		=7.58	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.					=3.6	=3.6	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.					<5.3	<5.3	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
1 - Effluent Gross												
Season: 0			Req.					<=10 MO AVG	<=15 DAILY MX	19 - mg/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												
Season: 0			Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly
NODI: -		NODI										
39508	PCB-1260	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										
50050	Flow, in conduit or thru treatment plant	Smpl.	=0.00297	=0.0192	03 - MGD		=0.00297	=0.0192	03 - MGD	0	01/90 - Quarterly	ES - ESTIMA
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		01/90 - Quarterly
NODI: -		NODI										

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:06 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:07 (Time Zone:-04:00)

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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 07/01/18 to 09/30/18 **DMR Due Date:** 10/31/18

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			# of Ex.	Freq. of Analysis	Smpl. Type
Code	Name		Value 1	Value 2	Units	Value 1	Value 2	Value 3			

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:22 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:22 (Time Zone:-04:00)

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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 07/01/18 to 09/30/18 **DMR Due Date:** 10/31/18
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 Code	Name	NODI	Quantity or Loading			Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3			
00010	Temperature, water deg. centigrade	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.						<=2.8 DAILY MX	04 - deg C		01/90 - Quarterly	MS - MEASRD
NODI: -	NODI						C - No Discharge				
00400	pH	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -	NODI				C - No Discharge		C - No Discharge				
01034	Chromium, total [as Cr]	Smpl.									
	2 - Effluent Net										
Season: 0	Req.					<=.2 MO AVG	<=.2 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI					C - No Discharge	C - No Discharge				
01092	Zinc, total [as Zn]	Smpl.									
	2 - Effluent Net										
Season: 0	Req.					<=1 MO AVG	<=1 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI					C - No Discharge	C - No Discharge				
39496	PCB-1242	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.						Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI						C - No Discharge				
39504	PCB-1254	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.						Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI						C - No Discharge				
39508	PCB-1260	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.						Req Mon DAILY MX	28 - ug/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI						C - No Discharge				
50050	Flow, in conduit or thru treatment plant	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD					MEASD - Measured	CN - CONTIN
NODI: -	NODI		C - No Discharge	C - No Discharge							
50064	Chlorine, free available	Smpl.									
	1 - Effluent Gross										
Season: 0	Req.					<=.2 MO AVG	<=.5 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -	NODI					C - No Discharge	C - No Discharge				
71871		Smpl.									

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:39 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:39 (Time Zone:-04:00)

Permit

Permit ID: DC0000094 **Major:** ☒
Permittee: PEPCO Environment Management Services **Permittee Address:** 701 Ninth Street, NW, Room 6219
 WASHINGTON , DC20019
Facility: PEPCO - BENNING **Facility Location:** 3300 BENNING ROAD, N.E.
 WASHINGTON , DC20019
Permitted Feature: 202 - External Outfall **Discharge:** 202-B - COOLING TOWER BASIN WASH WATER

Report Dates & Status

Monitoring Period: From 07/01/18 to 09/30/18 **DMR Due Date:** 10/31/18
Status: **NetDMR Validated**

Considerations for Form Completion

COOLING TOWER UNITS 15 & 16

Principal Executive Officer

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

No Data Indicator (NODI)

Form NODI: -

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:42 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:42 (Time Zone:-04:00)

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Permit

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

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

Report Dates & Status

Monitoring Period: From 07/01/18 to 09/30/18
Status: **NetDMR Validated**

DMR Due Date: 10/31/18

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Submission Note

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

Edit Check Errors

No errors.

Comments**Attachments**

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:44 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:44 (Time Zone:-04:00)

Permit

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

Report Dates & Status

Monitoring Period: From 07/01/18 to 09/30/18 **DMR Due Date:** 10/31/18
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**

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:47 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2018-10-05 16:47 (Time Zone:-04:00)

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

Annual Inspection of the Drainage System

As reported in the second quarter 2018 status report, an internal inspection of the facility's drainage system, using closed-circuit television (CCTV), was conducted between February 26 and April 18, 2018 by an AECOM subcontractor.

AECOM's evaluation of the CCTV inspection data indicated that the majority of storm drain lines that discharge to Outfall 013 are in relatively good condition. However, AECOM recommended corrective actions for those conditions classified as significant or moderate, such as structural defects in certain storm drain laterals, that warranted repair or replacement of portions of the storm drain lines.

Pepco obtained proposals from contractors to perform the repairs and has selected Flippo Construction to perform the work. The repair work is scheduled to start in late October. The progress on this effort will be provided with the next quarterly report.

Site Drainage Map

Pepco has updated the drainage map based on the CCTV inspection data to reflect the changes to the site drainage areas as a result of the installation of the stormwater treatment system and the new fueling island (see attached). The updated drainage map is added to the Stormwater Pollution Prevention Plan.

Drainage Area Information			
Drainage ID	Drainage Location	Size (Acres)	Area (Sq. Feet)
DA 001	Outfall 001	1.1	75,375
DA 002	Outfall 002	1.1	75,375
DA 003	Outfall 003	1.1	75,375
DA 004	Outfall 004	1.1	75,375
DA 005	Outfall 005	1.1	75,375
DA 006	Outfall 006	1.1	75,375
DA 007	Outfall 007	1.1	75,375
DA 008	Outfall 008	1.1	75,375
DA 009	Outfall 009	1.1	75,375
DA 010	Outfall 010	1.1	75,375
DA 011	Outfall 011	1.1	75,375
DA 012	Outfall 012	1.1	75,375
DA 013	Outfall 013	1.1	75,375
DA 014	Outfall 014	1.1	75,375
DA 015	Outfall 015	1.1	75,375
DA 016	Outfall 016	1.1	75,375
DA 017	Outfall 017	1.1	75,375
DA 018	Outfall 018	1.1	75,375
DA 019	Outfall 019	1.1	75,375
DA 020	Outfall 020	1.1	75,375
DA 021	Outfall 021	1.1	75,375
DA 022	Outfall 022	1.1	75,375
DA 023	Outfall 023	1.1	75,375
DA 024	Outfall 024	1.1	75,375
DA 025	Outfall 025	1.1	75,375
DA 026	Outfall 026	1.1	75,375
DA 027	Outfall 027	1.1	75,375
DA 028	Outfall 028	1.1	75,375
DA 029	Outfall 029	1.1	75,375
DA 030	Outfall 030	1.1	75,375
DA 031	Outfall 031	1.1	75,375
DA 032	Outfall 032	1.1	75,375
DA 033	Outfall 033	1.1	75,375
DA 034	Outfall 034	1.1	75,375
DA 035	Outfall 035	1.1	75,375
DA 036	Outfall 036	1.1	75,375
DA 037	Outfall 037	1.1	75,375
DA 038	Outfall 038	1.1	75,375
DA 039	Outfall 039	1.1	75,375
DA 040	Outfall 040	1.1	75,375
DA 041	Outfall 041	1.1	75,375
DA 042	Outfall 042	1.1	75,375
DA 043	Outfall 043	1.1	75,375
DA 044	Outfall 044	1.1	75,375
DA 045	Outfall 045	1.1	75,375
DA 046	Outfall 046	1.1	75,375
DA 047	Outfall 047	1.1	75,375
DA 048	Outfall 048	1.1	75,375
DA 049	Outfall 049	1.1	75,375
DA 050	Outfall 050	1.1	75,375
DA 051	Outfall 051	1.1	75,375
DA 052	Outfall 052	1.1	75,375
DA 053	Outfall 053	1.1	75,375
DA 054	Outfall 054	1.1	75,375
DA 055	Outfall 055	1.1	75,375
DA 056	Outfall 056	1.1	75,375
DA 057	Outfall 057	1.1	75,375
DA 058	Outfall 058	1.1	75,375
DA 059	Outfall 059	1.1	75,375
DA 060	Outfall 060	1.1	75,375
DA 061	Outfall 061	1.1	75,375
DA 062	Outfall 062	1.1	75,375
DA 063	Outfall 063	1.1	75,375
DA 064	Outfall 064	1.1	75,375
DA 065	Outfall 065	1.1	75,375
DA 066	Outfall 066	1.1	75,375
DA 067	Outfall 067	1.1	75,375
DA 068	Outfall 068	1.1	75,375
DA 069	Outfall 069	1.1	75,375
DA 070	Outfall 070	1.1	75,375
DA 071	Outfall 071	1.1	75,375
DA 072	Outfall 072	1.1	75,375
DA 073	Outfall 073	1.1	75,375
DA 074	Outfall 074	1.1	75,375
DA 075	Outfall 075	1.1	75,375
DA 076	Outfall 076	1.1	75,375
DA 077	Outfall 077	1.1	75,375
DA 078	Outfall 078	1.1	75,375
DA 079	Outfall 079	1.1	75,375
DA 080	Outfall 080	1.1	75,375
DA 081	Outfall 081	1.1	75,375
DA 082	Outfall 082	1.1	75,375
DA 083	Outfall 083	1.1	75,375
DA 084	Outfall 084	1.1	75,375
DA 085	Outfall 085	1.1	75,375
DA 086	Outfall 086	1.1	75,375
DA 087	Outfall 087	1.1	75,375
DA 088	Outfall 088	1.1	75,375
DA 089	Outfall 089	1.1	75,375
DA 090	Outfall 090	1.1	75,375
DA 091	Outfall 091	1.1	75,375
DA 092	Outfall 092	1.1	75,375
DA 093	Outfall 093	1.1	75,375
DA 094	Outfall 094	1.1	75,375
DA 095	Outfall 095	1.1	75,375
DA 096	Outfall 096	1.1	75,375
DA 097	Outfall 097	1.1	75,375
DA 098	Outfall 098	1.1	75,375
DA 099	Outfall 099	1.1	75,375
DA 100	Outfall 100	1.1	75,375

- Legend**
- Drum Storage
 - Gasoline Pumping Facility
 - Transformer Storage / Storage Area
 - Stormwater Quality Structure
 - LIU Station
 - Stormwater Inlet
 - Stormwater Manhole
 - OW/Water Separator
 - Outfall
 - Boilification Box
 - Polluter Garden
 - Storm Drain Line
 - Trench Drain
 - Building/Fence Line/Structure
 - Drainage Area
 - Outfall 013 Sub-Drainage Area
 - Retention Pond
 - Stormwater Filtration System Installed at Holespot

Site Drainage Area Map

Benning Service Center
Potomac Electric Power Company, Inc.
Washington, DC

Figure Number: 1

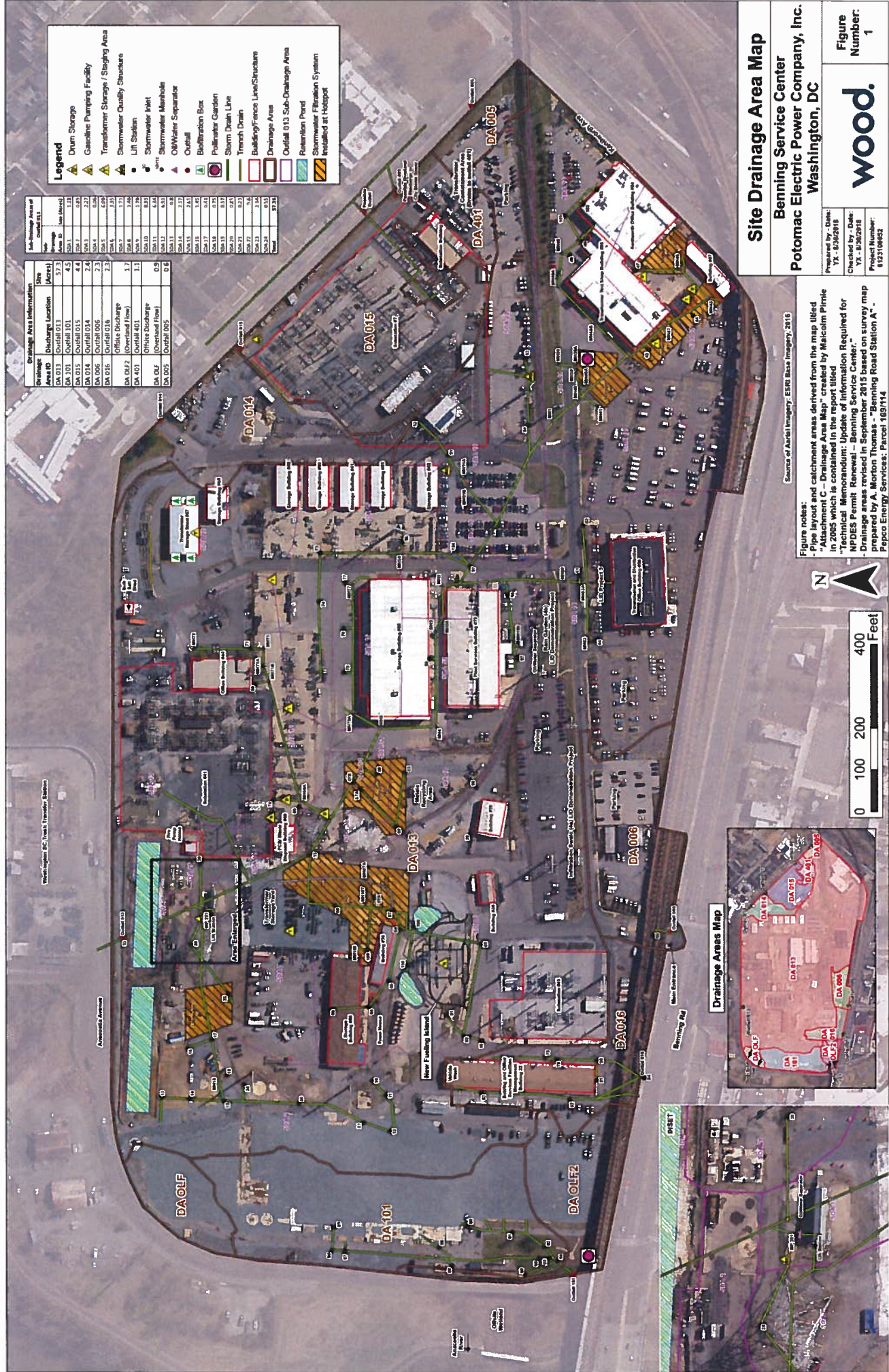
wood.

Prepared by: Date:
Y1 - 03/2018

Checked by: Date:
Y1 - 03/2018

Project Number:
812310662

Figure notes:
 - Pipe layout and catchment areas derived from the map titled "Attachment C - Drainage Area Map" created by Malcolm Pirnie in 2005 which is contained in the report titled "Technical Memorandum: Update of Information Required for PDES Permit Renewal in Benning Service Center, 2015" prepared by A. Morton Thomas - "Benning Road Station A" - Papco Energy Services, Parcel 169/114



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

Storm Drain Inlets Inspection Logs

The inspection logs for July - September 2018 are attached.



Weekly Inspection of Drain Guards 2018

[illegible]





Weekly Inspection of Drain Guards 2018

[illegible]

Weekly Inspection of Drain Guards 2018

Description		Normal Inspections										
Drain Number	Dimensions	Control Type	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by	Comments	Inspection Date	Inspected by	Comments	
1	24"x36"	Drain guard plus	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
2	27"x27"	Heavy metal witch hat	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
3	27"x27"	Heavy metal witch hat	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
4	24"x24"	Heavy metal witch hat	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
5	24"x24"	Heavy metal witch hat	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
6	24"x24"	Drain guard plus	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
7	36"x63"	Drain guard plus	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
8	26" Round	Heavy metal witch hat	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
9	24" Round	heavy metal sock	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
10	18" Round	heavy metal witch hat /sock	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
11	24" Round	heavy metal witch hat /sock	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
12	24" Round	heavy metal sock	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
13	42" Round	heavy metal sock	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
14	70"x90"	Drain guard plus	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
15	36"x40"	heavy metal witch/sock	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
16	24" Round	heavy metal sock	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
17	45"x45"	heavy metal sock	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
18	31"x31"	heavy metal sock	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
19	31"x31"	Heavy metal with sock	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
20	22"x49"	Heavy metal with sock	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
21	20" Round	Heavy metal with sock	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
24	18"x25"	Drain guard plus with sock	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
25	30" Round	Drain guard plus with sock	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
28	30" Round	Drain guard plus with sock	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
29	24" Round	Drain guard plus with sock	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
30	24" Round	Drain guard plus with sock	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
33	24" Round	Heavy metal with sock	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
37	27"x27"	Heavy metal with sock	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
38	117"Long	Curb guard plus	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
39	117"Long	Curb guard plus	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
40	233" Long	Curb guard plus	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
42	27"x27"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
43	27"x27"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
44	27"x27"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
45	233" Long	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
46	27"x27"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
47	27"x27"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
48	24"x24"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
49	145"x12"	sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
50	29"x32"	Heavy metal witch hat	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
51	65"x49"	Heavy metal witch hat.	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
52	24" Round	Heavy metal witch hat	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
53	145"x12"	Heavy metal witch hat	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
54	117" Long	Curb guard plus	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
55	117" Long	curb guard plus	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
56	35"x35"	Heavy metal with sock	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
57	24" Round	Heavy metal witch hat	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
58	35"x35"	Heavy metal witch hat	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
60	59" Long	Curb guard plus	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
61	117" Long	Curb guard plus	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
62	117" Long	curb guard plus	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
63	117" Long	Curb guard plus	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
64	117" Long	Curb guard plus	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
65	24"x27"	Heavy metal witch hat	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
66	50"x45"	Heavy metal witch hat	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
67	24" Round	Heavy metal witch hat	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
68	66" Long	Curb guard plus	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
69	70"x37"	Heavy metal with sock	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
70	70"x37"	Curb guard plus	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
71	70"x37"	Curb guard plus /sock	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
72	24" Round	Curb guard plus /s	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
73	32"x32"	Heavy metal witch hat	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
74	32"x32"	Heavy metal witch hat	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
75	24" Round	Heavy metal witch hat	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
76	32"x32"	Heavy metal witch hat	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
77	35"x35"	Heavy metal witch hat	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
78	16"x16"	Heavy metal witch hat	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
79	14"x14"	Curb guard plus	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
80	24" round	Heavy metal witch hat	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
81	10"x18"	Heavy metal witch hat	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
82	19x19"	Heavy metal witch hat	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
83	19"x19"	Heavy metal witch hat	9/7/2018	CV	Found OK	9/14/2018	CV	Found OK	9/21/2018	CV	Found OK	
85	10"x18"	Heavy metal drain guard	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
86	19"x19"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
87	19"x19"	Heavy metal with sox	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
88	20"x20"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
89	48"x36"	Heavy metal with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
90	8" round	Curb guard plus with sock	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
91	18"x18"	Inlet guard	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
97	24"x1	Inlet guard	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
98	70"x37"	Sock	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
99	48"x40"	Heavy metal guard with boom	9/6/2018	CV	Found OK	9/13/2018	CV	Found OK	9/20/2018	CV	Found OK	
100	24"x1"	Heavy metal boom curb guard plus	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/19/2018	CV	Found OK	
101	27"x27"	Curb guard plus	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
102	12"x16"	Curb guard plus	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
103	12"x16"	Curb guard plus	9/4/2018	CV	Found OK	9/11/2018	CV	Found OK	9/18/2018	CV	Found OK	
104	96" long	sock	9/5/2018	CV	Found OK	9/12/2018	CV	Found OK	9/21/2018	CV	Found OK	
107	28" Round	curb guard plus	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
108	32" x 32"	Heavy metal witch hat	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
109	48"x48"	Heavy metal witch hat	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
110	48"x48"	Heavy metal witch hat	HOLIDAY			9/10/2018	CV	Found OK	9/17/2018	CV	Found OK	
Windshield Inspections												
Date	Time	Comments	Inspector									
9/7/2018	930	Checked OK	J Brown									
9/14/2018	9:00	Checked OK	J Brown									
9/21/2018	10:30	Checked OK	J Brown									
</												



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

Monthly Site Inspections

The site-wide inspection logs for July - September 2018 are attached. Any issues or deficiencies found during the site inspections were brought to the attention of area supervisors to make sure they were corrected. As part of the on-going effort to maintain good housekeeping practices at the site, equipment and materials that are no longer in use are systematically identified and removed from the site.

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Inspection Date: 7-25-2018
Inspector: Terry Morrow

Inspection Time: 8:30 AM
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 witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?

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

Spill Prevention & Response

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

Do spill kits contain the proper tools and equipment?

	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Are outside work areas clean, dry, and free of litter and debris?	✓		✓		✓		✓		✓		
Is the grass and plants properly maintained in the area?	✓		✓		✓		✓		✓		Went Need To be REMOVE FROM 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?	✓		✓		✓		✓		✓		drain 78 look Good & Clean
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		drain 45 NEED NEW Boom b1 Transformer Shop
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		



Pepco – Benning Road Facility

Site Wide Monthly Inspection Report

	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?	✓		NA								
Is the wash water captured properly -- not entering storm drain system?	✓		NA								
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?	✓			✓		✓		✓		✓	contact Mr. Swilley about removing AT Building 32 Metal & Debris from area
Other Indicators of Illicit Discharges											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		✓		

**Pepco – Benning Road Facility
Site Wide Monthly Inspection Report**

Inspection Date: 8-15-2018

Inspection Time: 3:30 AM

Inspector: Joseph Morrow

Inspector's Signature: Joseph C. Morrow



	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?	✓		✓		✓		✓		✓		
Is the area free of potential discharges of leaks and spills?	✓		✓		✓		✓		✓		
Are containment areas in good condition, with valves closed?	✓		✓		✓		✓		✓		
Are drums labeled and stored on proper containment?	✓		✓		✓		✓		✓		
Are there any Frac Tanks in the area? If Yes, indicate if properly labeled to identify the content?		✓		✓		✓		✓		✓	
Are catch basins and storm drain inlets in the area to the storm drain system free from debris?	✓		✓		✓		✓		✓		
Are booms in place and in good condition at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are witch hats in place, in good condition and free of debris at catch basins and other inlets to the storm drain system?	✓		✓		✓		✓		✓		
Are there signs of drainage issue or overflow at any storm drain inlet?		✓		✓		✓		✓		✓	
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		



Terry McGraw
Joseph Sawyer

Pepco - Benning Road Facility

Site Wide Monthly Inspection Report

8-15-18 - 2018 - 3:30 PM

	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?	✓		NA								
Is the wash water captured properly -- not entering storm drain system?	✓		NA								
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?	✓			✓		✓		✓		✓	Metal & debris from Bid 32 removed
Other Indicators of Illicit Discharges											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		✓		

AREA

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Inspection Date: 9-26-2018

Inspection Time: 8:30AM

Inspector: Thayer Banks

Inspector's Signature: Thayer Banks

	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?	✓		✓		✓		✓		✓		
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?	✓		✓		✓		✓		✓		



Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Maurice Banks
9-26-2018

	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?	✓										Oily gravel removed from Substation (Decontam and disposed of)
Is the wash water captured properly -- not entering storm drain system?	✓										
Erosion and Sediment Controls											
Is there any soil erosion, dust or sediment build-up entering the storm drain inlets?		✓		✓		✓		✓		✓	
Are there uncovered pile of soil or junk metal equipment in the area?		✓		✓		✓		✓		✓	
Other Indicators of Illicit Discharges											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓			✓		✓		✓		✓	

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

Status of Stormwater Treatment System

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

The analytical results of the first and second quarter 2018 sampling at Outfall 013 indicated that the treatment system was not functioning as expected. A Compliance Action Plan was prepared by AECOM to evaluate the performance of the system, and to identify and implement corrective actions to ensure that the treatment system is functioning as intended to ensure consistent compliance with the NPDES permit limits. The plan was submitted to EPA on June 4. Table 1 of the Plan summarized the specific action items completed or underway at that time.

Table 1 has been periodically updated and provided to EPA as the action items were completed. The update provided to EPA on September 10 showed the completion of Task 1 and status of other corrective actions. Task 1 included certain modifications to the treatment system. Flippo Construction commenced construction of the proposed modifications on 8/3/18 and completed the work on 8/17/18. Pepco completed flushing of drainage system to remove any construction related debris on 8/31/2018.

Pepco collected the third quarter stormwater sample from Outfall 013 during a qualifying storm event on 9/7/2018. The analytical results showed full compliance with the permit limits for all metals. However, there was a slight exceedance of the monthly average limit for TSS. The sampling results are summarized in the table below:

Analyte	Units	Permit Daily Maximum Limit	Permit Monthly Average Limit	September 7, 2018 sampling results
Copper	mg/L	0.0134	0.00524	0.0044
Lead	mg/L	0.06458	0.0566	0.0036
Zinc	mg/L	0.117	0.073	0.0329
Cadmium	mg/L	0.00495	0.00208	<0.00025
Iron	mg/L	1	0.69	0.26
Total suspended solids	mg/L	100	30	38

Pepco is continuing to work with AECOM to ensure the treatment system is functioning as intended and achieving pollutant removal efficiency consistent with the design targets so as to ensure compliance with the permit limits for TSS going forward. As noted in the most recent updated summary Table 1 provided to EPA on October 22, 2018 (see attached), Pepco is still working to optimize the flow volumes to the treatment systems to ensure proper functioning during storms of different intensities and that the compliance samples collected in accordance with the procedures specified in the permit are representative of stormwater quality following treatment. Pepco will continue to update EPA on these efforts.

Table 1. Recommended Initial Action Plan (Version 4)

Task Action	Structures For	Action items	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)
1 Review As-built Drawings - Rationale: Required by DOE Stormwater Management Division as part of construction completion; also needed for system evaluation - Review, identify missing information and items needing clarification - Collect missing information - Evaluate potential impact of deviations - Identify and implement fixes, if needed	All	AECOM/Flippo	AECOM completed a review of as-built drawings on 4/30/18. Flippo responded 5/31/18. AECOM completed the additional as-built survey on 5/24/18 to fill data gaps identified by AECOM. AECOM currently performing an as-built review and hydraulic evaluation, which was anticipated to be completed by 6/8/18.	Pepco SWTM project team (Pepco, AECOM, and Flippo) participated in a technical meeting on 6/13/18 to discuss the proposed Initial Corrective Actions (ICAs) for stormwater treatment. Based on this meeting, an agreed upon draft schedule was developed for data collection, treatment design, and construction/installation.	AECOM delivered the Remedial Design (Rev 6) to Pepco on 7/20/18. The Remedial Design (Rev 6) included proposed modification to flow splitters and treatment units. Flippo began implementing the proposed modifications on 8/3/18 and completed work on 8/17/18. Pepco completed flushing of the drainage system to remove any construction related debris on 8/31/18.	Task Completed.
2 CCTV Inspection of Drainage System - Rationale: Consent Decree requirement; also needed for system performance evaluation - Includes new storm drain lines installed as part of treatment system, but not treatment system components or structures	Site-wide storm drain system	AECOM/Pepco	CCTV inspection completed; accumulated sediment and debris identified during inspection (9.5 tons) was removed as of 5/29/18.	AECOM submitted draft report and received comments from Pepco. CCTV Inspection Report (Rev Final) submitted to Pepco on 7/13/18.	Pepco is in the process of engaging a contractor to make system repairs.	System repair work expected to begin in October 2018.
3 Test Functioning of the Check Valves - Rationale: To ensure check valves are functioning as designed and not impeding flow - Flippo inspected the check valves and noted minor debris, but no blockage	Check valves at HS1 and HS4	Flippo	Completed on 4/24/18.	The need and use of check valves will be evaluated as part of Task 1.	The check valves were determined to be not warranted. Flippo removed the check valves at FS-2 and FS-6 on 7/16/18 and 8/3/18, respectively.	Task completed.
4 System Operation & Maintenance (O&M) - Rationale: O&M per manufacturer's recommendations key to system performance - Bi-annual O&M inspections by certified CONTECH O&M Contractor, as required by Consent Decree	Jellyfish, StormFilter s, and DownSpout StormFilter s	CONTECH/ Pepco/ i- STORMWATER (Pepco's O&M Contractor)	i-STORMWATER has performed two O&M inspections, 2/26/18 and 5/14/18 – 5/18/18. The most prevalent observation reported by i-STORMWATER was that only a fraction of stormwater was being diverted into the treatment units at the upstream flow splitters. Initial corrective action is to adjust flow splitters as necessary to ensure proper flow of stormwater into the treatment units. Additional corrective actions may be identified following completion of Task 1.	Following project team meeting on 6/13/18, O&M recommendations from i-STORMWATER were incorporated into the ICA table.	Recommendations have been addressed under Task 1.	Next O&M inspection by i-STORMWATER scheduled for November 2018.

Task Recommended Action	Structures	Action items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)
- Quarterly visual and physical inspection of treatment structure components - Cleaning of accumulated sediment in accordance with O&M manual including after bypass events - Replacement of Jellyfish and StormFilter media for proper performance - Documentation of O&M activities		which includes a full as-built review and hydraulic evaluation.				
5	Dry Condition Inspection	All	AECOM/i-STORMWATER/CONTECH	Completed on 5/15/18. Recommendations from i-STORMWATER are the same as above.	Following project team meeting on 6/13/18, Dry Conditions inspection recommendations from i-STORMWATER were incorporated into the ICA table.	On 9/21/18, AECOM completed an additional Dry Conditions inspection with CONTECH. CONTECH's observations at most structures identified that (a) Corrective actions by Filippo appear to have been done successfully; (b) Little to no observable flow (as expected); and (c) No irregularities observed.
	- Rationale: To inspect each treatment structure. - Document any conditions or deficiencies impeding treatment.					Additional observations at 168 (Hotspot 2); JF-3A, JF-3B, SF-3A, and SF-3B (Hotspot 3); and JF-4 (Hotspot 4) require further evaluation. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11.
6	Wet Condition Inspection	All	AECOM/CONTECH/i-STORMWATER	Completed on 5/18/18. Recommendations from i-STORMWATER are the same as above. Recommendations from CONTECH include: 1. Modifications or repairs at flow splitters to ensure proper flow to treatment system 2. Resealing of structures forebay walls, clearwell walls, and longitudinal wall-to-floor joints. 3. Investigation of potential backwater conditions at StormFilter units 4. Repair leaks at deck fasteners at Jellyfish JF-1. 5. Repair joint leak in weir wall to filter deck at Inlet Jellyfish 168. AECOM has collected additional field data to determine necessary adjustments to flow splitters and will document findings in a tech memo expected by 6/08/18. Corrective actions will be implemented as soon as possible thereafter. Additional corrective actions may be identified following completion of Task 1.	Following project team meeting on 6/13/18, Dry and Wet Conditions inspection recommendations from i-STORMWATER and CONTECH were incorporated into the ICA table.	Recommendations have been addressed under Task 1. Following cleaning/flushing of the storm drain lines, an additional Wet Conditions inspection will be scheduled and led by AECOM. This is anticipated to be performed during a qualifying rain event in September 2018.
	- Rationale: To inspect and observe the functionality of treatment structures during a rain event. - Document any conditions or deficiencies impeding treatment.					On 9/17/18 and 9/23/18, AECOM completed additional Wet Conditions inspections. Flow splitters (FS-1, -2, -3, -4, -5, and -6) and Jellyfish structures (JF-1, -3A, -3B, and -4) were observed to be functioning as designed, diverting and treating stormwater.
						Additional observations made at StormFilter Structures SF-1, -2, -3A, -3B, and -4 will require further evaluation to confirm design stormwater treatment. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11.

Task Action	Recommended Action	Structures For	Action items Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)
			which includes a full as-built review and hydraulic evaluation.			
7	Clean Jelly Fish Unit Deck	Jellyfish	Pepco/ i- STORMWAT ER	Based on O&M inspection completed 5/14/18 – 5/18/18 by i-STORMWATER, no cleaning was warranted at the Jellyfish units.	No update (8/28/18).	Next O&M inspection by i-STORMWATER is scheduled for November 2018.
	- Rationale: Per CONTECH, sediment on JF deck could result in erroneous results - CONTECH recommends cleaning of deck and backwash pool prior to sampling - Sediment accumulates at these locations through grated covers or during bypass flow					
8	Installation of Fixed Sampling Points	Jellyfish and StormFilters	AECOM/ i- STORMWAT ER	Completed on 5/29/18.	No update (7/6/18).	Fixed SW sampling points were inspected and blank samples were collected during the Dry Conditions inspection on 9/5/18 and 9/6/18. The SW sampling points were observed to be functioning as intended.
	- Rationale: Recommended by CONTECH upon reviewing two rounds of initial acceptance testing results - CONTECH recommends fixed, dedicated sample ports and using pumps for sampling - CONTECH's approach facilitates collection of more representative treated/untreated samples Based on a call with CONTECH technical staff, AECOM prepared a SOW for this installation					Task completed.
9	Additional Influent and Effluent Sampling	Jellyfish and StormFilters	AECOM/ CONTECH	To be scheduled for qualifying rain event following completion of Tasks 1-8.	No update (7/6/18).	Tasks 1-8 have been completed. SW Sampling is anticipated to be performed during a qualifying rain event in September 2018.
	- Rationale: Evaluate performance of individual treatment system components - Results of initial acceptance testing sampling (completed April 2018) may not be representative of system performance due to lack of proper flow to treatment components and difficulty of isolating influent and effluent flows for sampling - Additional samples to be collected using new sampling points once corrective actions identified					Based on field observations during wet weather inspections following completion of system modification under Task 1, further evaluation is needed to confirm design stormwater treatment before proceeding with additional influent and effluent sampling. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11.

Task	Recommended Action	Structures	Action items	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)
	in Tasks 1-8 are implemented.						
10	Flood Treatment Structures to Rinse Fines	StormFilter s	Pepco / - STORMWAT ER	Need for this task will be reevaluated based on the findings of Tasks 1-9.	No update (7/6/18)	Tasks 1-8 have been completed. Pepco completed cleaning/flushing of the storm drain lines on 8/31/18.	Task completed.
	- Rationale: To rinse filters and underdrains of zeolite dust per CONTECH recommendation - Zeolite dust itself has no metals, but could adsorb metals - Zeolite dust, if present in effluent, could result in higher effluent concentrations						
11	Evaluation of the Design to Optimize Operation of StormFilter Systems	All	CONTECH/ AECOM	NA	NA	NA	On 10/17/18, CONTECH completed an additional inspection of the StormFilters to confirm equipment type and configuration. AECOM is currently working with CONTECH to evaluate the performance of the StormFilter systems based on the as-built configurations. AECOM is currently rerunning the flow model for each hotspot based on additional data/information provided by CONTECH for their proprietary treatment units. Based on this more detailed and site-specific modeling, AECOM and CONTECH will develop detailed recommendations to optimize stormwater flow and performance at these treatment structures for a range of storm events up to maximum system design.
	- Re-inspection of stormwater treatment units and components to confirm equipment type and configuration. - Investigate water quality inflows to each hot spot treatment unit - Initial routing calculations for each structure - Rerun the SWMM model to include the Jellyfish filter and StormFilter treatment structures. - Design modifications (if necessary) - Check the hydraulic grade line (HGL) for water quantity flows. - Review data and develop potential options to optimize performance at these treatment structures.						

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

Stormwater Management Training

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





E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	988536 Thomas	James	R	76047 PEP Elec Maint	Substation	N	P03624	Substation Tech Trainee II	861762 Pegram, Emanuel	911589 Rosser, Nigel	905407 Fisher, Sandra	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	913364 Jabor	Ashley	Aloris	76045 PEPo-UG Maint & Construct	Substation	M	EV01	Business Analyst	855992 Call, David	646975 Pinto, Robert	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	988432 Powell	Danielle		76048 PEP PEPo Substation Engineering	Substation	M	8944P	Intern PH	909761 Vermorel, Alex	913112 Hjelst, Maura	905407 Fisher, Sandra	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	988433 Weymann	Lauren		76047 PEP Elec Maint	Substation	N	P03783	Jr Substation Tech	856193 Kurtz, Andrew	857433 Couzo, Henry	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	857294 Taylor Jr	Paula	J	76047 PEP Storm Pepo	Substation	M	P03775	General Manager Driver A	857125 Cox, George	905407 Fisher, Sandra	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	860347 Richardson Jr	Robert	J	76047 PEP Storm Pepo	Substation	M	CT1A	Work Center	904333 Hill, George	905407 Fisher, Sandra	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	858574 Hart	Andrew	N	76014 PEP Storm Pepo	Substation	M	P03734	Distribution Designer A	963568 Thomas, Sarmon	904409 Pritch, Rebecca	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	857955 Humphreys	Timothy	Joseph	76046 PEP Elec Maint	Protection & Tele	N	MSD3	Manager Material & Logistics	356056 Hurley, Michele	4804 Jandisch, Edward	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	988535 Saunders	Kenneth	D	76047 PEP Elec Maint	Substation	N	P03179	Lead Electronic Tech	858711 Sldmore, Earl	911589 Rosser, Nigel	905407 Fisher, Sandra	8/7/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	989056 Williams	James	Dennis	76047 PEP Elec Maint	Substation	N	P03624	Substation Tech Trainee II	860534 Dumb, Ian	911589 Rosser, Nigel	905407 Fisher, Sandra	8/4/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	861027 Hickerson	Eric	L	76047 PEP Elec Maint	Substation	N	P07351	Sr Substation Tech-Oper	857957 Holloway, Donald	911589 Rosser, Nigel	905407 Fisher, Sandra	8/5/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	860995 Proctor	Kwanka	A	76046 PEP Elec Maint	Protection & Tele	N	P03179	Lead Electronic Tech	859168 Ford, Mitchell	4941 Cox, James	905407 Fisher, Sandra	8/8/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	988909 Curtis	Walter	John	76046 PEP Elec Maint	Protection & Tele	M	P03365	Electronic Tech B	904409 Pritch, Rebecca	905407 Fisher, Sandra	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	913137 Struman	Robert	John	76047 PEP Elec Maint	Substation	N	P03783	Jr Substation Tech	857215 Spaulding, John	4941 Cox, James	905407 Fisher, Sandra	8/4/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	911211 Barnes	Edward	Clyde	76046 PEP Elec Maint	Protection & Tele	N	P07612	Electronic Tech A	33152 Brant, Shawn	857433 Couzo, Henry	905407 Fisher, Sandra	8/7/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	988768 Chattravaty	Dilip		79046 PSC Integrated Work Coordination P	Substation	M	ETC3	General Engineer	963332 Desai, Sanjay	504999 Jidadi, Kathleen	613663 Ortega, Miguel	8/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	908669 Dorch	Kyle	Dennis	76045 PEPo-UG Maint & Construct	Substation	M	P03253	Distribution Tester C	861812 Gibson, Anthony	855992 Call, David	105670 Sullivan, William	8/3/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	908787 Stallings	Joseph	William	76047 PEP Elec Maint	Substation	N	EBM5	Supr Work Management	963333 Lirte, George	646975 Pinto, Robert	105670 Sullivan, William	9/4/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	861034 Johnson	Anthony	Andre	76047 PEP Elec Maint	Substation	N	P03783	Substation Tech Trainee II	856193 Kurtz, Andrew	857433 Couzo, Henry	905407 Fisher, Sandra	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	908784 Portale	Richard	M	76047 PEP Elec Maint	Substation	N	P03780	Sr Substation Tech	85668 Burch, Darryl	905407 Fisher, Sandra	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	911278 Woch	Bin		76047 PEP Elec Maint	Substation	M	BGA2	Sr Engineer	760000 Slezak, Mark	506402 Fisher, Sandra	905407 Fisher, Sandra	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	910837 Jablemichiel	Geni	E	76045 PEPo-UG Maint & Construct	Substation	N	P03251	Distribution Tester A	861812 Gibson, Anthony	855992 Call, David	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)	855961 Trebb	Michael	I	76047 PEP Elec Maint	Substation	N	P03780	Tent Specialist	4941 Cox, James	905407 Fisher, Sandra	105670 Sullivan, William	9/2/18
E-P-PH-ELEC-ENVIRSTRMHWATPOLL	Papad Environmental Storm Water Pollution Prevention Plan (CBT)								Lead Substation Tech	33152 Brant, Shawn	857433 Couzo, Henry	905407 Fisher, Sandra	9/2/18



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

Stormwater Pollution Prevention Plan

The updated Summary Table 1 of the Plan is attached. The table identifies the new leader named to the Stormwater Pollution Prevention Team during July - September 2018 (see also paragraph 68.a.8).



SUMMARY TABLE 1
STORM WATER POLLUTION PREVENTION TEAM

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

Leader:	Ghirmay Berhe
Title:	Senior Engineer
Office Phone:	202-331- 6735
Responsibilities:	Review of NPDES and storm water regulations Initial site evaluation Identification of potential pollutant sources Selection of proposed best management practices (BMPs) Evaluation of the SWP3 on an annual basis
Member # 1:	Tim Dinsmore
Title:	Senior Environmental Coordinator
Office Phone:	202-388-2429
Responsibilities:	Initial site evaluation Identification of potential pollutant sources Selection of proposed best management practices (BMPs) Evaluation of the SWP3 on an annual basis
Member # 2:	Andrew Hart
Title:	Manager - Material & Logistics
Office Phone:	(202) 388-2384
Responsibilities:	Identification of potential pollutant sources Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis
Member # 3:	Sean Burton
Title:	Supervisor - Facility Operations
Office Phone:	(202) 388-2438
Responsibilities:	Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis
Member # 4:	Kenneth Guiles
Title:	Supervisor - Distribution
Office Phone:	(202) 388-2117
Responsibilities:	Identification of potential pollutant sources Implementation of proposed BMPs Evaluation of the SWP3 on an annual basis



SUMMARY TABLE 1
STORM WATER POLLUTION PREVENTION TEAM

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

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



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

Change in Management Responsibilities

There was one change in management responsibilities during July - September 2018, as identified in Summary Table 1 of the Stormwater Pollution Prevention Plan (see paragraph 68.a.7). A new leader has been named for the pollution prevention team (Ghirmay Berhe).



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

Status of Completion of Transformer Storage Shed

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



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

Status of Stormwater Retention Project

As reported in the second quarter 2018 status report, Pepco determined that the Stormwater Retention Project described in Section VIII of the Consent Decree was not technically feasible, and it has paid the stipulated penalty for not implementing this project. As also noted in the last status report, although not required under the terms of the consent decree or the permit, Pepco is evaluating alternative options for treating stormwater discharges to Outfall 101. As part of this effort, Pepco's technical consultant (Princeton Hydro) is collecting data on the metals and solid loading in the Outfall 101 drainage area. Pepco collected both individual and composite samples from four inlets (87, 88, 90, and 91) during qualifying storm events on August 21 and September 17, 2018. These inlets are used to collect quarterly composite samples as required by the permit. The purpose of individual inlet sampling is to determine which inlet, or portion of the drainage area, contributes higher metal and suspended solids loading in stormwater discharges to Outfall 101. The comparison of the August and September sampling results showed that concentration of metals and solids were significantly lower in both individual and composite samples collected in September, with an average reduction of approximately 50 percent. Although, stormwater sampling is inherently variable, the overall decreased concentration may be attributable to the on-going vacuum street sweeping efforts around the storm drain inlets and impervious areas draining to Outfall 101.

Pepco will conduct additional discrete sampling of inlets to further investigate the source of metal and suspended solids loading at the site. The sampling data will provide further insight on selecting a feasible alternative option for treating stormwater runoff.

Pepco along with Princeton Hydro gave a tour of the Outfall 101 drainage area to Anacostia Riverkeeper and Anacostia Watershed Society on September 12, 2018. The purpose of this meeting was to share Pepco's plan for evaluating alternative options for treating stormwater runoff in the Outfall 101 drainage area as well as to solicit their input on the alternative treatment options currently being considered.



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

Description of Non-Compliance

Pepco collected the third quarter compliance samples from Outfall 013 during a qualifying storm event on September 7, 2018. The analytical results showed full compliance with the permit limits for all metals, however, there was a slight exceedance of monthly average limit for TSS. The permit monthly average limit for TSS is 30 mg/l. The sampling result showed 38 mg/l.

As described in Paragraph 68.a.5 - Status of Stormwater Treatment System, Pepco is continuing to work with AECOM to ensure the treatment system is functioning as intended and achieving pollutant removal efficiency consistent with the design targets so as to ensure compliance with the permit limits for TSS going forward.

In addition, Pepco continues to implement the best management practices identified in the Phase III TMDL Implementation Plan and required by the consent decree, including storm drain inlet maintenance, metals management, and good housekeeping practices to eliminate or reduce sources of metals and solids to stormwater discharged from the site.

