

Via Electronic and US Mail - 7017 0190 0000 4738 3129

July 29, 2019

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

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

Dear Ms. Hopkins,

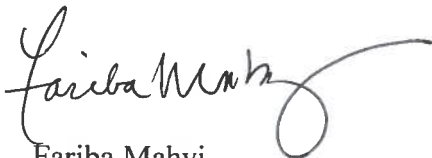
In accordance with Paragraph 68 of the Benning Facility Consent Decree, please find attached the following reports for the period of April - June 2019:

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

The certification statement signed by the Vice President of Support Services is also attached.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Fariba Mahvi', with a large, stylized flourish at the end.

Fariba Mahvi
Sr. Project Manager
Environmental Services

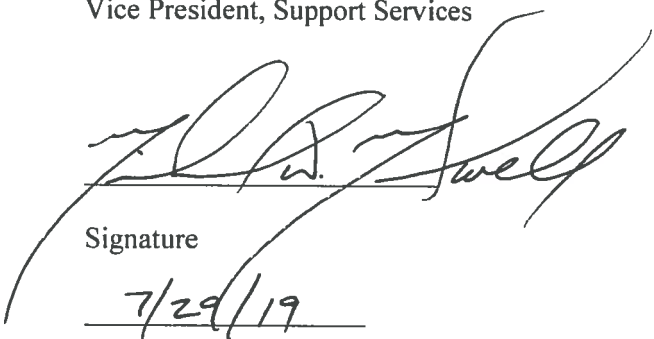
Attachments

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

7/29/19

Date

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

Discharge Monitoring Reports

Copies of DMRs for April - June 2019 are attached.

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 03/01/19 to 04/30/19 **DMR Due Date:** 05/28/19
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	Units		
50050	Flow, in conduit or thru treatment plant	Smpl.	=0.00161	=0.0147	03 - MGD					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 was completed in compliance with the permit condition, therefore, no additional 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: 2019-05-26 10:22 (Time Zone: -04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-05-26 10:22 (Time Zone: -04:00)

Permit

Permit ID: DC0000094

Major: ✓

Permittee: PEPCO Environment Management Services

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

Facility: PEPCO - BENNING

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

Permitted Feature: 003 - External Outfall

Discharge: 003-A - OIL/WATER SEPARATOR

Report Dates & Status

Monitoring Period: From 04/01/19 to 04/30/19

DMR Due Date: 05/28/19

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

PCBS WILL USE ANALY MET.608

Principal Executive Officer

First Name: William

Last Name: Sullivan

Title: VP, Operations

Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

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

Parameter Code	Name	NODI	Quantity or Loading			Quality or Concentration			# 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 OWS in April 2019.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-05-26 09:56 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-05-26 09:56 (Time Zone:-04:00)

Permit

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

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

Permitted Feature: 003 - External Outfall

Report Dates & Status

Monitoring Period: From 05/01/19 to 05/31/19
Status: **NetDMR Validated**

DMR Due Date: 06/28/19

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	Ex.	Type

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: 2019-06-17 12:27 (Time Zone: -04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-06-17 12:28 (Time Zone: -04:00)

Permit

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

Major:

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

Permitted Feature: 003 - External Outfall

DMR Due Date: 07/28/19

Report Dates & Status

Monitoring Period: From 06/01/19 to 06/30/19
Status: **NetDMR Validated**

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		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	

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 during June 2019.

Attachments

No attachments.

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

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-07-19 16:27 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-07-19 16:27 (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: 013 - External Outfall Discharge: 013-A - BNON COOLING WATER BLOWDOWN

Report Dates & Status

Monitoring Period: From 05/01/19 to 06/30/19 DMR Due Date: 07/28/19
 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			
50050	Flow, in conduit or thru treatment plant	Smpl.	=0.000946	=0.005	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 was met in compliance with the permit condition, therefore, no further 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: 2019-07-26 08:30 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-07-26 08:30 (Time Zone:-04:00)

Permit

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

Major: ✓
Permittee Address: 701 Ninth Street, NW, Room 6219
WASHINGTON , DC20019
Facility Location: 3300 BENNING ROAD, N.E.
WASHINGTON , DC20019
Discharge: 013-Q - No Blowdown

Permitted Feature: 013 - External Outfall

DMR Due Date: 07/28/19

Report Dates & Status

Monitoring Period: From 04/01/19 to 06/30/19
Status: **NetDMR Validated**

Considerations for Form Completion

NO BLOWDOWN

Principal Executive Officer

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: 

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

Parameter Code	Name	NODI	Quantity or Loading		Units	Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2		Value 1	Value 2	Value 3				
00400	pH											
1 - Effluent Gross		Smpl.				=7.38		=7.51	12 - SU	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.				>=6 MINIMUM		<=8.5 MAXIMUM	12 - SU		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00530	Solids, total suspended											
1 - Effluent Gross		Smpl.					=25.5	=25.5	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.					<=30 MO AVG	<=100 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
00556	Oil & Grease											
1 - Effluent Gross		Smpl.					<5.5	<5.5	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										
X 01042	Copper, total [as Cu]											
1 - Effluent Gross		Smpl.					=9.2	=9.2	28 - ug/L	1	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										
01045	Iron, total [as Fe]											
1 - Effluent Gross		Smpl.					=0.63	=0.63	19 - mg/L	0	01/90 - Quarterly	GR - GRAB
Season: 0		Req.					<= .69 MO AVG	<=1 DAILY MX	19 - mg/L		01/90 - Quarterly	GR - GRAB
NODI: -		NODI										
01051	Lead, total [as Pb]											
1 - Effluent Gross		Smpl.					=9.9	=9.9	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.					=60	=60	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.									
1 - Effluent Gross								=0	28 - ug/L	0	01/90 - Quarterly GR - GRAB
Season: 0		Req.						<=1 DAILY MX	28 - ug/L		01/90 - Quarterly GR - GRAB
NODI: -		NODI									

Submission Note

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

Edit Check Errors

Parameter		Monitoring Location	Field	Type	Description	Acknowledge
Code	Name					
01042	Copper, total [as Cu]	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	

Comments**Attachments**

Name	Type	Size
AttachmentsJuly2019.pdf	pdf	125448

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-07-26 16:11 (Time Zone: -04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-07-26 16:12 (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)
013	6/2/2019	19.25	0.44	180
013	6/13/2019	8	1.3	50
013	6/17/2019	8	0.99	89

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction Calculations for June 2, 13, and 17, 2019 samplings at Outfall 013.

Outfall	Parameter	Sample Dates	Average Concentration (mg/L) (a)	Average Flow (cfs) ^(b)	Load (mg/s)	Maximum Daily Limit (mg/L) (c)	Maximum Daily Stormwater Discharge Concentration Goals for Metals (b)	Baseline Concentration (mg/L)	Source of Baseline Concentration ^(a)	Average Baseline Flow (cfs)	Baseline Load (mg/s)	Pollutant Reduction Compared with Maximum Daily Discharge Concentration ⁽ⁱ⁾	Pollutant Concentration Measured with Baseline Concentration ^(a)	Pollutant Load Compared with Baseline Load ^(a)
0130	TSS	6/2 & 6/17/2019	25.5	3.04	2105.13	100	100	4.2	(b) Highest TSS discharge concentration from DMR data for Quarterly stormwater DMR data for 2019. Flow was measured on Apr-Jun 2005	4.82	5322	75%	30%	02%
	Cadmium	6/2 & 6/17/2019	<0.000250	3.04	0.0 ^(a)	0.00485	0.0045	0.00075	(b) Reasonable potential. Cadmium concentration for stormwater DMR data for Apr-Jun 2005	7.48	0.16	100%	100%	100%
	Copper	6/2, 6/13 & 6/17/2019	0.0052	3.04	0.70	0.01344	0.0134	0.004	(b) Highest copper discharge concentration from DMR data for Quarterly stormwater DMR data for Apr-Jun 2005	3.14	5.7	32%	86%	86%
	Iron	6/2, 6/13 & 6/17/2019	0.63	3.04	54.23	100	NA	5.60	(b) Highest iron discharge concentration from DMR data for Quarterly stormwater DMR data for Apr-Jun 2005	0.148	24	37%	46%	123%
	Nickel	6/2 & 6/17/2019	0.0266	3.04	2.20	0.117 ^(a)	0.117	0.056	(b) Reasonable potential. Nickel concentration for stormwater DMR data for Apr-Jun 2005	0.148	0.23	77%	53%	<87%
	Lead	6/2 & 6/17/2019	0.0066	3.04	0.85	0.06450	0.0645	0.023	(b) Highest lead discharge concentration from DMR data for Quarterly stormwater DMR data for Apr-Jun 2005	7.48	4.9	85%	57%	81%
	Zinc	6/2, 6/13 & 6/17/2019	0.16	3.04	5.2	0.11718	0.117	0.9	(b) Highest zinc discharge concentration from DMR data for Quarterly stormwater DMR data for Apr-Jun 2005	5.15	131	40%	93%	96%
	PCB 1342	6/2 & 6/17/2019	<0.000500	3.04	0.0 ^(a)	No Discharge	NA	0	Quarterly DMHs for Outfall 0130. PCB Accords were not tested from 2005 to 2010	NA ^(a)	0 ^(a)	0%	0% ^(a)	0% ^(a)
	PCB 1254	6/2 & 6/17/2019	<0.000400	3.04	0.0 ^(a)	No Discharge	NA	0	Quarterly DMHs for Outfall 0130. PCB Accords were not tested from 2005 to 2010	NA ^(a)	0 ^(a)	0%	0% ^(a)	0% ^(a)
	PCB 1360	6/2 & 6/17/2019	<0.000400	3.04	0.0 ^(a)	No Discharge	NA	0	Quarterly DMHs for Outfall 0130. PCB Accords were not tested from 2005 to 2010	NA ^(a)	0 ^(a)	0%	0% ^(a)	0% ^(a)
	TSS	6/17/2019	45	0.54	689	Monitor Only	0.0645 ^(a)	41	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	259	NA	10%	<169%
	Cadmium	6/17/2019	0.000316	0.54	0	0.0645 ^(a)	0.1075	0.0012	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	0.0076	93%	74%	36%
Copper	6/17/2019	0.0483	0.54	0.36	0.0645 ^(a)	0.0134	0.093	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	0.56	<260%	48%	<26%	
Iron	6/17/2019	2.3	0.54	16.2	Monitor Only	NA	NA	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	24	<35%	30%	<47%	
Nickel	6/17/2019	0.0266	0.54	0.42	0.117 ^(a)	0.117	0.06	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	0.57	75%	68%	22%	
Lead	6/17/2019	0.0335	0.54	0.12	0.0645 ^(a)	0.0645	0.13	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	0.82	48%	74%	36%	
Zinc	6/17/2019	0.0936	0.54	1.43	0.117 ^(a)	0.117	0.57	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	3.6	20%	64%	60%	
PCB 1342	6/17/2019	<0.000500	0.54	0.0 ^(a)	No Discharge	NA	NA	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	0 ^(a)	NA	0%	0% ^(a)	
PCB 1254	6/17/2019	<0.000500	0.54	0.0 ^(a)	No Discharge	NA	NA	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	0 ^(a)	NA	0%	0% ^(a)	
PCB 1360	6/17/2019	<0.000500	0.54	0.0 ^(a)	No Discharge	NA	NA	Third Quarter 2011 DMR for Marloose K. Flow was measured in September 2011	0.223	0 ^(a)	NA	0%	0% ^(a)	

Prepared by ASC 7/26/2019
Checked by JAF 7/26/2019

sources.

mg/L = milligram per liter
NS = Not sampled
NA = Not applicable

Pollutant concentration was not detected. Concentration used in pollutant load calculations is set to zero.

* Flow was measured when samples were collected on June 17, 2010

Not required by 2003 NPDES Permit for Banning Generating Station

Data from the September 5, 2011 sampling event for Marinho K was established as the baseline load because it was the only sampling event for Marinho K. Flow was estimated based on the slow velocity and catchment area; sample could be collected from Marinho K. Flow was estimated based on the slow velocity and catchment area.

No maximum daily limit is listed. Value is the Maximum Daily Stormwater Discharge Concentration Grade 41 Metals

Marble K has no maximum daily limit for the constituent and is monitoring only. Value listed is the Maximum Daily

Positive values indicate that the June 2010 concentrations were lower than the baseline concentrations.

There were no defections of PCH Auctions. Therefore a baseline flow was not established. However, given that the

Baseline concentrations are based on the highest concentration listed in DMHs for Outfall 013Q from 2005 to 2009.

Permit

Permit ID: DC0000094
 Permittee: PEPCO Environment Management Services

Major:

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

Facility: PEPCO - BENNING

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

Permitted Feature: 101 - External Outfall

Discharge: 101-Q - (no description)

Report Dates & Status

Monitoring Period: From 04/01/19 to 06/30/19

DMR Due Date: 07/28/19

Status: **NetDMR Validated**

Considerations for Form Completion

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

Principal Executive Officer

First Name: William

Last Name: Sullivan

Title: VP, Operations

Telephone: 202-872-2942

No Data Indicator (NODI)

Form NODI: -

Parameter		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			
							Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
39504	PCB-1254						=0	=0	28 - ug/L	01/90 - Quarterly	GR - GRAB
1 -	Effluent Gross	Smpl.							0		
Season: 0		Req.					Req Mon MO AVG	Req Mon DAILY MX	28 - ug/L	01/90 - Quarterly	GR - GRAB
NODI: -		NODI									
39508	PCB-1260						=0	=0	28 - ug/L	01/90 - Quarterly	GR - GRAB
1 -	Effluent Gross	Smpl.							0		
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						=0.349	=0.349	03 - MGD	01/90 - Quarterly	ES - ESTIMA
1 -	Effluent Gross	Smpl.							0		
Season: 0		Req.					Req Mon MO AVG	Req Mon DAILY MX	03 - MGD	01/90 - Quarterly	ES - ESTIMA
NODI: -		NODI									
TS000	Toxicity, Acute										
1 -	Effluent Gross	Smpl.									
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 sampling requirement was met in compliance with the permit condition. Therefore, no further sampling was conducted.

Attachments

Name	Type	Size
Attachments101July2019.pdf	pdf	80712

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

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-07-26 16:24 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-07-26 16:24 (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	6/17/2019	8	0.99	89

Attachment 2

NPDES Permit DC 0000094

Permit Condition Part VII.E

Pollutant Load Percent Reduction Calculations for June 17, 2019 sampling at Outfall 101.

Outfall	Parameter	Sample Dates	Average Concentration (mg/L)	Average Flow (cfs) ⁽¹⁾	Load (mg/d)	Maximum (mg/L)	Maximum Daily Discharge Concentration Goal for Metals (B)	Baseline Concentration (mg/L)	Source of Baseline Concentration ^(1b)	Average Baseline Flow (cfs)	Baseline Flow (mg/d)	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⁾
013Q	TSS	6/2 & 6/17/2019	25.5	3.04	2195.13	100	100	42	(a) Highest TSS discharge concentration from DMR data for Outfall 013Q from Oct-Dec 2010. TSS was not reported on DMRs for Jul-Sep 2009. Flow was measured in Outfall 013Q for Apr-Jun 2005.	4.82	5732	75%	39%	62%
013Q	Cadmium	6/2 & 6/17/2019	<0.00250	3.04	0.01	0.0045	0.0045	0.0075	(b) Reasonable potential analysis concentration for cadmium from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2005.	7.48	0.16	100%	100%	100%
013Q	Copper	6/2 & 6/17/2019	0.0022	3.04	0.76	0.0134	0.0134	0.064	(c) Highest copper discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2005.	3.14	5.7	32%	86%	86%
013Q	Iron	6/2 & 6/17/2019	0.63	3.04	54.23	100	NA	5.90	(d) Highest iron discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2005.	0.148	24	37%	89%	123%
013Q	Nickel	6/2 & 6/17/2019	0.0266	3.04	2.26	0.117 ⁽¹⁾	0.117	0.056	(e) Reasonable potential analysis concentration for nickel from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2005.	0.148	0.23	77%	53%	1076%
013Q	Lead	6/2 & 6/17/2019	0.0066	3.04	0.85	0.0645	0.0645	0.023	(f) Highest lead discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2005.	7.48	4.9	85%	57%	83%
013Q	Zinc	6/2 & 6/17/2019	0.06	3.04	5.2	0.117 ⁽¹⁾	0.117	0.9	(g) Highest zinc discharge concentration from DMR data for Outfall 013Q. Quarterly stormwater DMR data for Jul-Sep 2005.	5.15	131	40%	93%	96%
013Q	PCB-1242	6/2 & 6/17/2019	<0.000500	3.04	0.01 ⁽¹⁾	No Discharge	NA	0	Quantity DMR for Outfall 013Q. PCBs were not reported on DMRs for Jul-Sep 2005.	NA ⁽¹⁾	0 ⁽¹⁾	0%	0%	0%
013Q	PCB-1254	6/2 & 6/17/2019	<0.000500	3.04	0.01 ⁽¹⁾	No Discharge	NA	0	Quantity DMR for Outfall 013Q. PCBs were not reported on DMRs for Jul-Sep 2005.	NA ⁽¹⁾	0 ⁽¹⁾	0%	0%	0%
013Q	PCB-1260	6/2 & 6/17/2019	<0.000500	3.04	0.01 ⁽¹⁾	No Discharge	NA	0	Quantity DMR for Outfall 013Q. PCBs were not reported on DMRs for Jul-Sep 2005.	NA ⁽¹⁾	0 ⁽¹⁾	0%	0%	0%
Marine K	TSS	6/17/2019	45	0.54	688	Marine Obey	NA	41	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	259	NA	-10%	-100%
Marine K	Cadmium	6/17/2019	0.000316	0.54	0	0.0045 ⁽¹⁾	0.0075	0.0012	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	0.0078	93%	74%	36%
Marine K	Copper	6/17/2019	0.0483	0.54	0.739	0.0134 ⁽¹⁾	0.0134	0.063	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	0.59	-260%	46%	-26%
Marine K	Iron	6/17/2019	2.3	0.54	35.2	Marine Obey	NA	3.8	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	24	-435%	36%	-47%
Marine K	Nickel	6/17/2019	0.0289	0.54	0.442	0.117 ⁽¹⁾	0.117	0.06	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	0.57	75%	66%	22%
Marine K	Lead	6/17/2019	0.0236	0.54	0.512	0.0645 ⁽¹⁾	0.0645	0.13	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	0.62	48%	74%	38%
Marine K	Zinc	6/17/2019	0.0936	0.54	1.43	0.117 ⁽¹⁾	0.117	0.57	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	3.6	20%	84%	60%
Marine K	PCB-1242	6/17/2019	<0.000500	0.54	0.01 ⁽¹⁾	No Discharge	NA	0.01 ⁽¹⁾	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	0 ⁽¹⁾	NA	0%	0%
Marine K	PCB-1254	6/17/2019	<0.000500	0.54	0.01 ⁽¹⁾	No Discharge	NA	0.01 ⁽¹⁾	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	0 ⁽¹⁾	NA	0%	0%
Marine K	PCB-1260	6/17/2019	<0.000500	0.54	0.01 ⁽¹⁾	No Discharge	NA	0.01 ⁽¹⁾	Third Quarter 2011 DMR for Marine K ⁽¹⁾ . Flow was measured in September 2011.	0.223	0 ⁽¹⁾	NA	0%	0%

Sources:
 (1) Second Quarter Sample Analytical Results: Merck & Co., Inc.
 (2) USEPA 2003a Authorization to Discharge Under the National Pollutant Discharge Elimination System Industrial Permit Number: DC0000084 United States Environmental Protection Agency Effective July 19, 2006
 (3) Maximum Daily Limit listed in the 2006 NPDES Permit

Notes:
 mg/L - milligrams per liter
 mg/d - milligrams per day
 NS - Not Sampled
 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 on June 17, 2019.
 (3) Not required by 2006 NPDES Permit for Benning Generating Station.
 (4) Maximum Daily Limit for Benning Generating Station.
 (5) Value is the Maximum Daily Discharge Concentration Goal for Metals listed in Section VII E of the 2006 NPDES Permit for Benning Generating Station.
 (6) Marine K has no maximum daily limit for the constituent and is monitoring only. Value listed is the Maximum Daily Discharge Concentration Goal for Metals listed in Section VII E of the 2006 NPDES Permit for Benning Generating Station.
 (7) Positive values indicate that the June 2019 concentrations were lower than the maximum daily limit for the pollutants.
 (8) There were no detections of PCBs. Therefore, a baseline flow was used to calculate the pollutant load. The baseline flow was 0.54 cfs.
 (9) Baseline concentrations are based on the highest concentration listed on DMRs for Outfall 013Q from 2005 to 2007. TSS was not reported on DMRs until 2009. Therefore, the baseline concentration for TSS is from the highest concentration listed on the Jul-Sep 2005 to 2010 DMRs for Outfall 013Q.

Permit

Permit ID: DC0000094

Major: /

Permittee: PEPCO Environment Management Services

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

Facility: PEPCO - BENNING

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

Permitted Feature: 201 - External Outfall

Discharge: 201-A - INTERNAL MONITORING PT. 201

Report Dates & Status

Monitoring Period: From 04/01/19 to 06/30/19

DMR Due Date: 07/31/19

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		Quantity or Loading			Quality or Concentration			=	Freq. of	Smpl.
Code	Name	Value 1	Value 2	Units	Value 1	Value 2	Value 3			

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: 2019-07-26 08:54 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-07-26 08:54 (Time Zone:-04:00)

Permit

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

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

Permitted Feature: 201 - External Outfall

Report Dates & Status

Monitoring Period: From 04/01/19 to 06/30/19
Status: **NetDMR Validated**

DMR Due Date: 07/31/19

*Considerations for Form Completion**Principal Executive Officer*

First Name: William
Title: VP, Operations

Last Name: Sullivan
Telephone: 202-872-2942 

No Data Indicator (NODI)

Form NODI: -

Parameter		NODI	Quantity or Loading			Quality or Concentration			# 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			
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: 2019-07-19 16:41 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-07-19 16:41 (Time Zone:-04:00)

Permit

Permit ID: DC0000094
Permittee: PEPCO Environment Management Services

Facility: PEPCO - BENNING

Permitted Feature: 202 - External Outfall

Report Dates & Status

Monitoring Period: From 04/01/19 to 06/30/19

Status: **NetDMR Validated**

Considerations for Form Completion

Net Value of PCBs

Principal Executive Officer

First Name: William
Title: VP, Operations

Major:

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

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

Discharge: 202-A - COOLING TOWER BLOWDOWN

DMR Due Date: 07/31/19

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

[illegible]

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: 2019-07-19 16:45 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-07-19 16:45 (Time Zone:-04:00)

11/19/2019 10:45 AM

Permit

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

Report Dates & Status

Monitoring Period: From 04/01/19 to 06/30/19 DMR Due Date: 07/31/19
 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: -

Code	Parameter Name	NODI	Quantity or Loading			Quality or Concentration			Units	# of Ex.	Freq. of Analysis	Smpl. Type
			Value 1	Value 2	Units	Value 1	Value 2	Value 3				
00400	pH	Smpl.										
	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: 2019-07-19 16:50 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-07-19 16:51 (Time Zone:-04:00)

Permit

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

Major:

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

Permitted Feature: 203 - External Outfall

Report Dates & Status

Monitoring Period: From 04/01/19 to 06/30/19
Status: **NetDMR Validated**

DMR Due Date: 07/31/19

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 Analysis	Type

[illegible]

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: 2019-07-19 16:54 (Time Zone:-04:00)

Report Last Signed By

User: FARIBA12
 Name: Fariba Mahvi
 E-Mail: fmahvi@pepco.com
 Date/Time: 2019-07-19 16:54 (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 04/01/19 to 06/30/19 **DMR Due Date:** 07/31/19
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				
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: 2019-07-19 16:57 (Time Zone: -04:00)

Report Last Signed By

User: FARIBA12
Name: Fariba Mahvi
E-Mail: fmahvi@pepco.com
Date/Time: 2019-07-19 16:57 (Time Zone: -04:00)

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

Annual Inspection of the Drainage System in 2018

As reported in the status report for the first quarter of 2019, the repair/replacement work on the drainage system identified from the 2018 CCTV inspection was completed in December 2018 (Phase I) and the remaining work (Phase II) was in progress. A summary of the progress of Phase II work was provided with the first quarter status report. The Phase II work was completed in May 2019 by performing the following additional work:

- Inlet 16 was abandoned in place by filling the inlet structure with stone and the existing pipe between Inlets 16 and 17 with inert material.
- The existing pipe between I13 and I13A was abandoned in place by filling the pipe with inert material.
- In the summary of Phase II provided with the first quarter status report, it was reported that a 70-foot section of the pipe downstream of inlet 27 to the Lift Station (prior to the transmission tower) would be replaced with a new 30-inch HDPE pipe. However, to ensure a safe working distance from the energized transmission lines, only 40 feet section of the existing pipe was replaced.

Annual Inspection of the Drainage System in 2019

An internal inspection of the facility's drainage system, using closed circuit television (CCTV), was conducted between April 22 and May 21, 2019 by Insight, LLC. A summary of the inspection results is provided below:

Insight performed a CCTV inspection of the main 48/54 inch storm drain pipe and the lateral storm drains that discharge to Outfall 013. It should be noted that this CCTV inspection was limited to the storm drain lines: the CCTV equipment was not capable of inspecting the stormwater treatment system structures, nor the smaller diameter laterals (4-6 inches) due to size. To facilitate the inspection and allow the camera to travel through the drainage pipe, Pepco conducted cleaning of the storm drain system via pressure washing and jetting as the inspection progressed.

Insight's evaluation of the CCTV inspection data indicated that the majority of the storm drain lines that discharge to Outfall 013 are in good condition. The inspection, however, identified evidence of structural defects (cracks and visible reinforcement), and deposits and debris in various locations within the drainage system. Insight's recommendation is to monitor the conditions of the structural defects during future CCTV inspections to assess whether corrective actions may be warranted in the future. In addition, Insight recommends the following corrective actions to address the conditions of the storm drain laterals in three areas identified below:

- MH 69A to Inlet (I)69 - realign/replace the pipe to correct the joint offset.
- MH 51D to the downstream T connection - replace the broken pipe segment

- MH 56 to I57 - replace the broken pipe segment.

Pepco will obtain proposals from contractors to perform the repairs in these areas. The progress on these efforts will be provided with the next quarterly report.

Insight also attempted to perform a CCTV inspection of the storm drain laterals and inlets located in the area of the former power plant that discharge to Outfall 101. As experienced in prior attempts to conduct camera surveys of the underground drain pipes in this area, camera access was significantly constrained by segments of collapsed pipe, the small diameter of certain of the lateral lines, and the presence of debris and standing water. The results of the limited survey conducted by Insight indicated the need for repairs in some areas and raised questions about the accuracy of the current drainage map. Pepco intends to conduct a follow up investigation to further assess the condition and configuration of the storm drain system in this area.

Sediment Removal

Pepco conducted cleaning of the storm drain system during and after completion of the CCTV inspection via pressure washing and jetting and removed approximately 4 tons of sediment and debris for off-site disposal. This material was collected in sludge boxes and disposed off-site in a permitted facility. Water from pressure washing was collected in a downgradient location acting as a sump to prevent discharge to the Anacostia River. Water collected in the sump was removed by vacuum truck, placed in the frac tanks at the site, filtered, and transported to Blue Plains Wastewater Treatment Plant in DC, in compliance with a hauler permit issued to Pepco by DC Water.

Site Drainage Map

Pepco is currently working on updating the site drainage map based on the CCTV inspection data. The updated drainage map will be added to the Stormwater Pollution Prevention Plan and provided to EPA with the next quarterly report.

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

Storm Drain Inlets Inspection Logs

The inspection logs for April - June 2019 are attached.

Weekly Inspection of Drain Guards 2019

Weekly Inspection of Drain Guards 2023									
Description		Drain	Drain Type	Comments	Inspection Date	Inspected By	Inspection Date	Comments	Inspected By
Drain Guard Plate	Drain guard plate	2A-36	Drain guard plate	Found OK	5/1/2023	LV	5/1/2023	Found OK	LV
	Heavy metal with hat	2B-27	Heavy metal with hat	Found OK	5/2/2023	CV	5/2/2023	Found OK	CV
	Heavy metal with hat	2C-27	Heavy metal with hat	Found OK	5/3/2023	LV	5/3/2023	Found OK	LV
	Heavy metal with hat	2D-24	Heavy metal with hat	Found OK	5/4/2023	CV	5/4/2023	Found OK	CV
	Heavy metal with hat	2E-24	Heavy metal with hat	Found OK	5/5/2023	LV	5/5/2023	Found OK	LV
	Drain guard plate	2F-24	Drain guard plate	Found OK	5/6/2023	CV	5/6/2023	Found OK	CV
	Drain guard plate	2G-24	Drain guard plate	Found OK	5/7/2023	LV	5/7/2023	Found OK	LV
	Heavy metal with hat	2H-24	Heavy metal with hat	Found OK	5/8/2023	CV	5/8/2023	Found OK	CV
	Heavy metal with hat	2I-24	Heavy metal with hat	Found OK	5/9/2023	LV	5/9/2023	Found OK	LV
	Heavy metal with hat	2J-24	Heavy metal with hat	Found OK	5/10/2023	CV	5/10/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2K-24	Heavy metal with hat	Found OK	5/11/2023	LV	5/11/2023	Found OK	LV
	Heavy metal with hat	2L-24	Heavy metal with hat	Found OK	5/12/2023	CV	5/12/2023	Found OK	CV
	Heavy metal with hat	2M-24	Heavy metal with hat	Found OK	5/13/2023	LV	5/13/2023	Found OK	LV
	Heavy metal with hat	2N-24	Heavy metal with hat	Found OK	5/14/2023	CV	5/14/2023	Found OK	CV
	Heavy metal with hat	2O-24	Heavy metal with hat	Found OK	5/15/2023	LV	5/15/2023	Found OK	LV
	Heavy metal with hat	2P-24	Heavy metal with hat	Found OK	5/16/2023	CV	5/16/2023	Found OK	CV
	Heavy metal with hat	2Q-24	Heavy metal with hat	Found OK	5/17/2023	LV	5/17/2023	Found OK	LV
	Heavy metal with hat	2R-24	Heavy metal with hat	Found OK	5/18/2023	CV	5/18/2023	Found OK	CV
	Heavy metal with hat	2S-24	Heavy metal with hat	Found OK	5/19/2023	LV	5/19/2023	Found OK	LV
	Heavy metal with hat	2T-24	Heavy metal with hat	Found OK	5/20/2023	CV	5/20/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2U-24	Heavy metal with hat	Found OK	5/21/2023	LV	5/21/2023	Found OK	LV
	Heavy metal with hat	2V-24	Heavy metal with hat	Found OK	5/22/2023	CV	5/22/2023	Found OK	CV
	Heavy metal with hat	2W-24	Heavy metal with hat	Found OK	5/23/2023	LV	5/23/2023	Found OK	LV
	Heavy metal with hat	2X-24	Heavy metal with hat	Found OK	5/24/2023	CV	5/24/2023	Found OK	CV
	Heavy metal with hat	2Y-24	Heavy metal with hat	Found OK	5/25/2023	LV	5/25/2023	Found OK	LV
	Heavy metal with hat	2Z-24	Heavy metal with hat	Found OK	5/26/2023	CV	5/26/2023	Found OK	CV
	Heavy metal with hat	2A-24	Heavy metal with hat	Found OK	5/27/2023	LV	5/27/2023	Found OK	LV
	Heavy metal with hat	2B-24	Heavy metal with hat	Found OK	5/28/2023	CV	5/28/2023	Found OK	CV
	Heavy metal with hat	2C-24	Heavy metal with hat	Found OK	5/29/2023	LV	5/29/2023	Found OK	LV
	Heavy metal with hat	2D-24	Heavy metal with hat	Found OK	5/30/2023	CV	5/30/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2E-24	Heavy metal with hat	Found OK	5/31/2023	LV	5/31/2023	Found OK	LV
	Heavy metal with hat	2F-24	Heavy metal with hat	Found OK	5/32/2023	CV	5/32/2023	Found OK	CV
	Heavy metal with hat	2G-24	Heavy metal with hat	Found OK	5/33/2023	LV	5/33/2023	Found OK	LV
	Heavy metal with hat	2H-24	Heavy metal with hat	Found OK	5/34/2023	CV	5/34/2023	Found OK	CV
	Heavy metal with hat	2I-24	Heavy metal with hat	Found OK	5/35/2023	LV	5/35/2023	Found OK	LV
	Heavy metal with hat	2J-24	Heavy metal with hat	Found OK	5/36/2023	CV	5/36/2023	Found OK	CV
	Heavy metal with hat	2K-24	Heavy metal with hat	Found OK	5/37/2023	LV	5/37/2023	Found OK	LV
	Heavy metal with hat	2L-24	Heavy metal with hat	Found OK	5/38/2023	CV	5/38/2023	Found OK	CV
	Heavy metal with hat	2M-24	Heavy metal with hat	Found OK	5/39/2023	LV	5/39/2023	Found OK	LV
	Heavy metal with hat	2N-24	Heavy metal with hat	Found OK	5/40/2023	CV	5/40/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2O-24	Heavy metal with hat	Found OK	5/41/2023	LV	5/41/2023	Found OK	LV
	Heavy metal with hat	2P-24	Heavy metal with hat	Found OK	5/42/2023	CV	5/42/2023	Found OK	CV
	Heavy metal with hat	2Q-24	Heavy metal with hat	Found OK	5/43/2023	LV	5/43/2023	Found OK	LV
	Heavy metal with hat	2R-24	Heavy metal with hat	Found OK	5/44/2023	CV	5/44/2023	Found OK	CV
	Heavy metal with hat	2S-24	Heavy metal with hat	Found OK	5/45/2023	LV	5/45/2023	Found OK	LV
	Heavy metal with hat	2T-24	Heavy metal with hat	Found OK	5/46/2023	CV	5/46/2023	Found OK	CV
	Heavy metal with hat	2U-24	Heavy metal with hat	Found OK	5/47/2023	LV	5/47/2023	Found OK	LV
	Heavy metal with hat	2V-24	Heavy metal with hat	Found OK	5/48/2023	CV	5/48/2023	Found OK	CV
	Heavy metal with hat	2W-24	Heavy metal with hat	Found OK	5/49/2023	LV	5/49/2023	Found OK	LV
	Heavy metal with hat	2X-24	Heavy metal with hat	Found OK	5/50/2023	CV	5/50/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2Y-24	Heavy metal with hat	Found OK	5/51/2023	LV	5/51/2023	Found OK	LV
	Heavy metal with hat	2Z-24	Heavy metal with hat	Found OK	5/52/2023	CV	5/52/2023	Found OK	CV
	Heavy metal with hat	2A-24	Heavy metal with hat	Found OK	5/53/2023	LV	5/53/2023	Found OK	LV
	Heavy metal with hat	2B-24	Heavy metal with hat	Found OK	5/54/2023	CV	5/54/2023	Found OK	CV
	Heavy metal with hat	2C-24	Heavy metal with hat	Found OK	5/55/2023	LV	5/55/2023	Found OK	LV
	Heavy metal with hat	2D-24	Heavy metal with hat	Found OK	5/56/2023	CV	5/56/2023	Found OK	CV
	Heavy metal with hat	2E-24	Heavy metal with hat	Found OK	5/57/2023	LV	5/57/2023	Found OK	LV
	Heavy metal with hat	2F-24	Heavy metal with hat	Found OK	5/58/2023	CV	5/58/2023	Found OK	CV
	Heavy metal with hat	2G-24	Heavy metal with hat	Found OK	5/59/2023	LV	5/59/2023	Found OK	LV
	Heavy metal with hat	2H-24	Heavy metal with hat	Found OK	5/60/2023	CV	5/60/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2I-24	Heavy metal with hat	Found OK	5/61/2023	LV	5/61/2023	Found OK	LV
	Heavy metal with hat	2J-24	Heavy metal with hat	Found OK	5/62/2023	CV	5/62/2023	Found OK	CV
	Heavy metal with hat	2K-24	Heavy metal with hat	Found OK	5/63/2023	LV	5/63/2023	Found OK	LV
	Heavy metal with hat	2L-24	Heavy metal with hat	Found OK	5/64/2023	CV	5/64/2023	Found OK	CV
	Heavy metal with hat	2M-24	Heavy metal with hat	Found OK	5/65/2023	LV	5/65/2023	Found OK	LV
	Heavy metal with hat	2N-24	Heavy metal with hat	Found OK	5/66/2023	CV	5/66/2023	Found OK	CV
	Heavy metal with hat	2O-24	Heavy metal with hat	Found OK	5/67/2023	LV	5/67/2023	Found OK	LV
	Heavy metal with hat	2P-24	Heavy metal with hat	Found OK	5/68/2023	CV	5/68/2023	Found OK	CV
	Heavy metal with hat	2Q-24	Heavy metal with hat	Found OK	5/69/2023	LV	5/69/2023	Found OK	LV
	Heavy metal with hat	2R-24	Heavy metal with hat	Found OK	5/70/2023	CV	5/70/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2S-24	Heavy metal with hat	Found OK	5/71/2023	LV	5/71/2023	Found OK	LV
	Heavy metal with hat	2T-24	Heavy metal with hat	Found OK	5/72/2023	CV	5/72/2023	Found OK	CV
	Heavy metal with hat	2U-24	Heavy metal with hat	Found OK	5/73/2023	LV	5/73/2023	Found OK	LV
	Heavy metal with hat	2V-24	Heavy metal with hat	Found OK	5/74/2023	CV	5/74/2023	Found OK	CV
	Heavy metal with hat	2W-24	Heavy metal with hat	Found OK	5/75/2023	LV	5/75/2023	Found OK	LV
	Heavy metal with hat	2X-24	Heavy metal with hat	Found OK	5/76/2023	CV	5/76/2023	Found OK	CV
	Heavy metal with hat	2Y-24	Heavy metal with hat	Found OK	5/77/2023	LV	5/77/2023	Found OK	LV
	Heavy metal with hat	2Z-24	Heavy metal with hat	Found OK	5/78/2023	CV	5/78/2023	Found OK	CV
	Heavy metal with hat	2A-24	Heavy metal with hat	Found OK	5/79/2023	LV	5/79/2023	Found OK	LV
	Heavy metal with hat	2B-24	Heavy metal with hat	Found OK	5/80/2023	CV	5/80/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2C-24	Heavy metal with hat	Found OK	5/81/2023	LV	5/81/2023	Found OK	LV
	Heavy metal with hat	2D-24	Heavy metal with hat	Found OK	5/82/2023	CV	5/82/2023	Found OK	CV
	Heavy metal with hat	2E-24	Heavy metal with hat	Found OK	5/83/2023	LV	5/83/2023	Found OK	LV
	Heavy metal with hat	2F-24	Heavy metal with hat	Found OK	5/84/2023	CV	5/84/2023	Found OK	CV
	Heavy metal with hat	2G-24	Heavy metal with hat	Found OK	5/85/2023	LV	5/85/2023	Found OK	LV
	Heavy metal with hat	2H-24	Heavy metal with hat	Found OK	5/86/2023	CV	5/86/2023	Found OK	CV
	Heavy metal with hat	2I-24	Heavy metal with hat	Found OK	5/87/2023	LV	5/87/2023	Found OK	LV
	Heavy metal with hat	2J-24	Heavy metal with hat	Found OK	5/88/2023	CV	5/88/2023	Found OK	CV
	Heavy metal with hat	2K-24	Heavy metal with hat	Found OK	5/89/2023	LV	5/89/2023	Found OK	LV
	Heavy metal with hat	2L-24	Heavy metal with hat	Found OK	5/90/2023	CV	5/90/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2M-24	Heavy metal with hat	Found OK	5/91/2023	LV	5/91/2023	Found OK	LV
	Heavy metal with hat	2N-24	Heavy metal with hat	Found OK	5/92/2023	CV	5/92/2023	Found OK	CV
	Heavy metal with hat	2O-24	Heavy metal with hat	Found OK	5/93/2023	LV	5/93/2023	Found OK	LV
	Heavy metal with hat	2P-24	Heavy metal with hat	Found OK	5/94/2023	CV	5/94/2023	Found OK	CV
	Heavy metal with hat	2Q-24	Heavy metal with hat	Found OK	5/95/2023	LV	5/95/2023	Found OK	LV
	Heavy metal with hat	2R-24	Heavy metal with hat	Found OK	5/96/2023	CV	5/96/2023	Found OK	CV
	Heavy metal with hat	2S-24	Heavy metal with hat	Found OK	5/97/2023	LV	5/97/2023	Found OK	LV
	Heavy metal with hat	2T-24	Heavy metal with hat	Found OK	5/98/2023	CV	5/98/2023	Found OK	CV
	Heavy metal with hat	2U-24	Heavy metal with hat	Found OK	5/99/2023	LV	5/99/2023	Found OK	LV
	Heavy metal with hat	2V-24	Heavy metal with hat	Found OK	5/100/2023	CV	5/100/2023	Found OK	CV
Heavy Metal with Hat	Heavy metal with hat	2W-24	Heavy metal with hat	Found OK	5/101/2023	LV	5/101/2023	Found OK	LV
	Heavy metal with hat	2X-24	Heavy metal with hat	Found OK	5/102/2023	CV	5/102/2023	Found OK	CV
	Heavy metal with hat	2Y-24	Heavy metal with hat	Found OK	5/103/2023	LV	5/103/2023	Found OK	LV
	Heavy metal with hat	2Z-24	Heavy metal with hat	Found OK	5/104/2023	CV	5/104/2023	Found OK	CV
	Heavy metal with hat	2A-24	Heavy metal with hat	Found OK	5/105/2023	LV	5/105/2023	Found OK	LV
	Heavy metal with hat	2B-24	Heavy metal with hat	Found OK	5/106/2023	CV	5/106/2023	Found OK	CV
	Heavy metal with hat	2C-24	Heavy metal with hat	Found OK	5/107/2023	LV	5/107/2023	Found OK	LV
	Heavy metal with hat	2D-24	Heavy metal with hat	Found OK	5/108/2023	CV	5/108/2023	Found OK	CV
	Heavy metal with hat	2E-24	Heavy metal with hat	Found OK	5/109/2023	LV	5/109/2023	Found OK	LV
	Heavy metal with hat	2F-24	Heavy metal with hat	Found OK	5/110/2023	CV	5/110/2023	Found OK	CV

Wendyfield Inspections			Inspector
Date	Time	Comments	
5/3/2019	9:00	checked OK	Brown
5/10/2019	10:00	checked OK	Brown

Weekly Inspection of Drain Guards 2019

Description		Normal Inspections		Inspection		Inspected		Inspected By		Comments		Inspection Date		Comments		Inspected By	
Drain Number	Control Type	Inspection	Inspected	Comments	Inspection	Inspected	Comments	Inspection Date	Inspected By	Comments	Inspection Date	Inspected By	Comments	Inspection Date	Inspected By	Comments	
1	Double guard plus	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
2	Heavy metal with hat	6/1/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
3	Heavy metal with hat	6/1/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
4	Heavy metal with hat	6/1/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
5	Heavy metal with hat	6/1/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
6	Drain guard plus	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
7	Drain guard plus	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
8	Heavy metal with hat	6/1/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
9	Heavy metal with hat	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
10	Heavy metal with hat / sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
11	Heavy metal with hat / sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
12	Heavy metal with hat	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
13	Heavy metal with hat	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
14	Heavy metal with hat	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
15	Heavy metal with hat	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
16	Inlet was removed	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
17	Heavy metal sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
18	Heavy metal sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
19	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
20	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
21	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
22	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
23	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
24	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
25	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
26	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
27	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
28	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
29	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
30	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
31	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
32	Drain guard plus with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
33	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
34	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
35	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
36	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
37	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
38	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
39	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
40	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
41	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
42	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
43	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
44	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
45	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
46	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
47	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
48	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
49	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
50	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
51	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
52	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
53	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
54	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
55	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
56	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
57	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
58	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
59	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
60	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
61	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
62	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
63	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
64	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
65	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
66	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
67	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
68	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
69	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
70	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
71	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
72	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
73	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
74	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
75	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
76	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
77	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
78	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019	CV	Found OK	
79	Heavy metal with sock	6/3/2019	CV	Found OK	6/10/2019	CV	Found OK	6/17/2019	CV	Found OK	6/24/2019	CV	Found OK	6/24/2019</			

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

Monthly Site Inspections

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

Transformer Storage Shed

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

Pepco – Benning Road Facility
Site Wide Monthly Inspection Report

Inspection Date: 4-24-2019

Inspector: Maurice Davis

Inspection Time: 11:00 AM

Inspector's Signature: Maurice Davis



	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?	✓		✓		✓		✓		✓		FRAC
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 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?	✓		N/A		N/A		NA		NA		
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?	✓			✓		✓		✓		✓	REMOVE pile of junk
Other Indicators of Illicit Discharges											
Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?	✓		✓		✓		✓		✓		

April
Maurice Barks
4-21-2019 11:00 AM

Maurice Barks

Peprco - Benning Road Facility
Site Wide Monthly Inspection Report

Inspection Date: MAY 17 2019
 Inspector: M. Banks

Inspection Time: 10:30 AM
 Inspector's Signature: [Signature]



	Former Power Plant Area		Former Cooling Tower Site		BSC East Area		BSC Central Area		BSC South Area		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Good Housekeeping Procedures											
Are outside work areas clean, dry, and free of litter and debris?	✓		✓		✓		✓		✓		
Is the grass and plants properly maintained in the area?	✓		✓		✓		✓		✓		
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?		N/A		N/A	✓		✓		✓		
Are there any Frac Tanks in the area? If yes, indicate if properly labeled to identify the content?		N/A		N/A	✓		✓		✓		
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?		✓	✓		✓		✓		✓		DRAIN NEED NEW TOPS 78 & 79
Spill Prevention & Response											
Is emergency/contingency equipment accessible in close proximity to storage areas (spill kits, drip pans, etc.)?	✓		✓		✓		✓		✓		
Do spill kits contain the proper tools and equipment?	✓		✓		✓		✓		✓		



Have all spills been properly cleaned up and disposed of property in the respective area?

Structural Control Devices

Has the vehicle wash catch basin been inspected for sediment build-up?

Is the wash water captured properly -- not entering storm drain system?

Erosion and Sediment Controls

Is there any soil erosion, dust or sediment build-up entering the storm drain inlets?

Are there uncovered pile of soil or junk metal equipment in the area?

Other Indicators of Illicit Discharges

Is the area clear of any signs of potential illicit discharges such as odors, staining, sheen, residue, etc.?

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	
☒	☒		☒		☒		☒		
☒			N/A		N/A		N/A		
☒			N/A		N/A		N/A		
☒	☒			☒		☒		☒	
	☒			☒		☒		☒	Depositor has island material exposed back at BSC #15 NEED to be covered
☒			☒		☒		☒		

MAY 17, 2019

Maurice Banks

Maurice Banks

Pepco - Benning Road Facility

Site Wide Monthly Inspection Report

Pepco-- Benning Road Facility
Site Wide Monthly Inspection Report

11,30

Inspection Date: 6-14-19

Inspection Time:

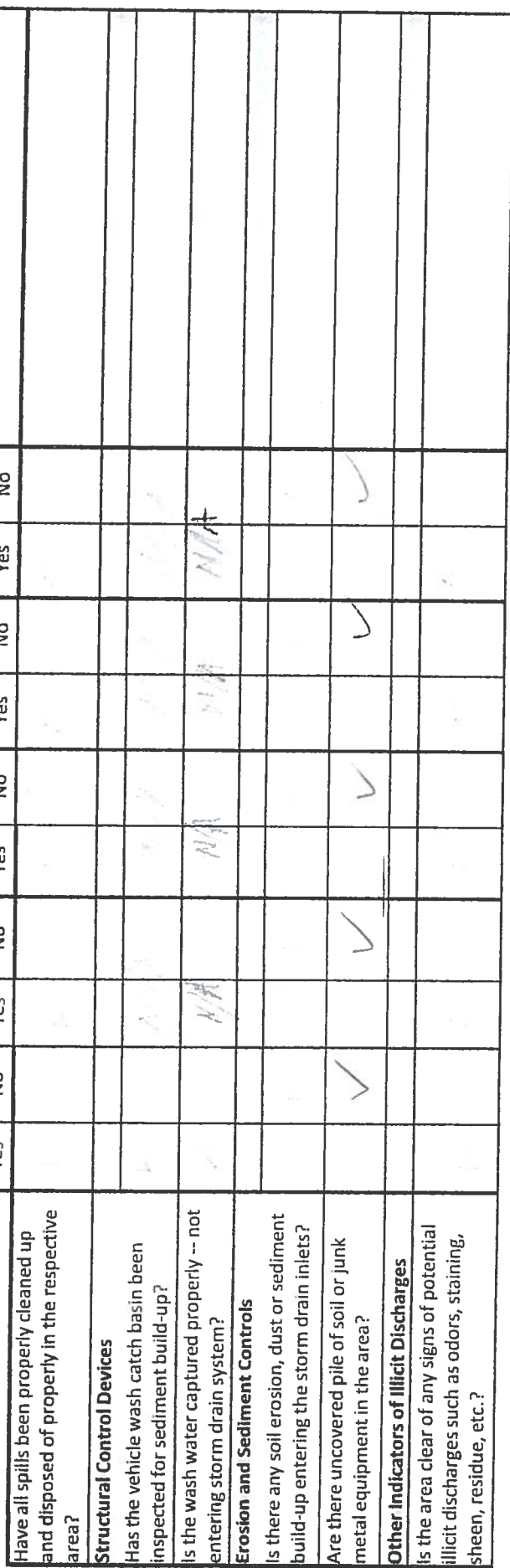
Inspector: M. Banks

Inspector's Signature: *Maurice 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?		✓		✓		✓		✓		✓	NEED CUTTING.
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?			N/A		✓				N/A		
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?	✓		✓		✓		✓		✓		

Site Wide Monthly Inspection Report



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

Status of Stormwater Treatment System

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

As described in prior quarterly status reports, the initial acceptance testing results were inconclusive and indicated that the samples may not have been representative of system performance. However, 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 (the consultant who designed the stormwater treatment system) to evaluate the performance of the system, and to identify and implement corrective actions to ensure that the treatment system is functioning as intended to ensure compliance with the NPDES permit limits. The plan was submitted to EPA on June 4, 2018. 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 attached Table 1 has been updated to identify the actions taken since the last update was provided to EPA on February 27, 2019. The bi-annual O&M inspection of the stormwater treatment system was conducted on May 30, 2019 by an authorized representative of Contech (the equipment supplier). The inspection showed that the Jelly Fish filters at Hotspots 1 and 4 have become occluded and need to be replaced. The filters were replaced between July 24 -26, 2019. AECOM continues to work with Contech to install automated samplers for collection of influent and effluent samples from the treatment system to resolve sampling issues identified during the initial acceptance testing. The samplers are expected to be installed in August 2019. The automated samplers will be used to collect influent and effluent samples at each hot spot during a qualifying storm event to determine the pollutant removal efficiency of the treatment system.

Table 1 - Recommended Initial Action Plan (Version 8)

Task	Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)	Status (as of February 26, 2019)	Status (as of July 26, 2019)
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.	Peppo SWTM project team (Peppo, AECOM, and Flippo) participated in a technical meeting on 6/13/18 to discuss the proposed initial Corrective Actions (ICAs) for stormwater treatment units. Flippo agreed upon draft schedule was developed for data collection, treatment design, and construction/installation. AECOM and Flippo have completed collection and review of initial (6/22/18) and additional survey data points (7/3/18). On 6/18/18, AECOM began working to finalize system hydraulic evaluation and corrective actions. AECOM is currently on schedule to deliver drawings and specifications for corrective actions to Peppo on 7/13/18.	AECOM delivered the Remedial Design (Rev 6) to Peppo 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. Peppo completed flushing of the drainage system to remove any construction related debris on 8/31/18. Following construction, AECOM received revised as-built drawings on 8/27/18. AECOM completed as-built review on 8/31/18, and noted no issues. AECOM uploaded the as-built data to the DOE SW Database on 9/4/18.	Task Completed	No update (12/20/18)	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)
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/Peppo	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 Peppo. CCTV Inspection Report (Rev Final) submitted to Peppo on 7/5/18.	Peppo is in the process of engaging a contractor to make system repairs.	System repair work expected to begin in October 2018.	Repair work is in progress and will be completed by 12/31/2018.	Priorly repair/replacement work as identified by the CCTV inspection was completed on 12/26/2018. Remaining work to be completed in the first quarter 2019.	Remaining repair/replacement work to be completed in the first quarter 2019.	Storm drain repair/replacement work has been completed by Flippo in the first quarter of 2019.
3	Test Functioning of the Check Valves Rationale: To ensure check	Check valves at HS1 and HS4	Flippo	Completed on 4/24/18	The need and use of check valves will be evaluated as part of Task 1.	The check valves were determined to be not warranted. Flippo removed the check valves at FS-2 and FS-6.	Task completed	No update (12/20/18)	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)

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	valves are functioning as designed and not impeding flow										
	Filippo inspected the check valves and noted minor debris, but no blockage										
4	System Operation & Maintenance (O&M) - Rationale: O&M per manufacturer's recommendations is key to system performance - Bi-annual O&M inspections by certified CONTECH O&M Contractor, as required by Consent Decree - Quarterly visual and physical inspection of treatment structure components - Cleaning of accumulated sediment in accordance with O&M manual including after bypass events - Replacement of Jellyfish and StormFilter media for proper performance - Documentation of O&M activities	Jellyfish, StormFilters, and DownSpout StormFilters	CONTECH/ Pepco/ i-STORMWATER (Pepco's O&M Contractor)	i-STORMWATER has performed two O&M inspections, 2/26/18 and 5/14/18 – 5/18/18. The most prevalent observation reported by i-STORMWATER was that only a fraction of stormwater was being diverted into the treatment units at the upstream flow splitters. Initial corrective action is to adjust flow splitters as necessary to ensure proper flow of stormwater into the treatment units. Additional corrective actions may be identified following completion of Task 1, which includes a full as-built review and hydraulic evaluation.	Following project team meeting on 6/13/18, O&M recommendations from i-STORMWATER were incorporated into the ICA table	Recommendations have been addressed under Task 1	Next O&M inspection by i-STORMWATER scheduled for November 29, 2018	O&M inspection completed by i-STORMWATER November 29, 2018	No update (01/17/19) See Task 11	No update (02/25/19) See Task 11	O&M inspection completed by i-STORMWATER May 2019. Based on the findings of the inspection, i-STORMWATER completed replacement of Jellyfish filters at HS#1 and HS#4 on July 26, 2019
5	Dry Condition Inspection	All	AECOM/ i-STORMWATER/	Completed on 5/15/18	Following project team meeting on 6/13/18, Dry	Recommendations have been addressed under	On 9/21/18, AECOM completed an additional	No update (12/20/18) See new Task 11	No update (01/17/19) See Task 11	No update (02/25/19) See Task 11	AECOM completed a preliminary inspection on

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	- Rationale: To inspect each treatment structure - Document any conditions or deficiencies impeding treatment		CONTECH	i-STORMWATER are the same as above	Conditions Inspection recommendations from i-STORMWATER were incorporated into the ICA table	Task 1 Following cleaning/flushing of the storm drain lines, AECOM completed an additional Dry Conditions inspection on 9/5/18 and 9/6/18, and no issues were noted. In addition, AECOM will lead CONTECH on an inspection of the systems on 9/21/18	Dry Conditions inspection with CONTECH. CONTECH's observations at most structures identified that (a) Corrective actions by Flippo appear to have been done successfully (b) Little to no observable flow (as expected), and (c) No irregularities observed				July 16, 2019 in preparation for installation of the automated samplers by Contech in August 2019
6	- Wet Condition Inspection - Rationale: To inspect and observe the functionality of treatment structures during a rain event - Document any conditions or deficiencies impeding treatment	All	AECOM/CONTECH/ i-STORMWATER	Completed on 5/18/18 Recommendations from i-STORMWATER are the same as above Recommendations from CONTECH include 1. Modifications or repairs at flow splitters to ensure proper flow to treatment system 2. Resealing of structures forebay walls, cleanwell 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 filler deck at inlet Jellyfish I68 AECOM has collected additional field data to determine necessary adjustments to flow splitters and will document findings in a tech memo expected by	Following project team meeting on 6/13/18, Dry Conditions Inspection recommendations from i-STORMWATER and CONTECH were incorporated into the ICA table	Recommendations have been addressed under Task 1 Following cleaning/flushing of the storm drain lines, an additional Wet Conditions Inspection will be scheduled and led by AECOM. This is anticipated to be performed during a qualifying rain event in September 2018	On 9/17/18 and 9/23/18, AECOM completed additional Wet Conditions inspections. Flow splitters (F-S-1, -2, -3, -4, -5 and -6) and Jellyfish structures (JF-1, -3A, -3B and -4) were observed to be functioning as designed, diverting and treating stormwater Additional observations made at StormFilter Structures SF-1, -2, -3A, -3B, and -4 will require further evaluation to confirm design stormwater treatment. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures See new Task 11	No update (12/20/18). See new Task 11	No update (01/17/19). See Task 11	No update (02/25/19). See Task 11	No update (07/26/19). See Task 11

Task Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)	Status (as of February 25, 2019)	Status (as of July 26, 2019)
			6/08/18 Corrective actions will be implemented as soon as possible thereafter. Additional corrective actions may be identified following completion of Task 1, which includes a full as-built review and hydraulic evaluation.							
7	Clean Jelly Fish Unit Deck - Rationale Per CONTECH, sediment on JF deck could result in erroneous results - CONTECH recommends cleaning of deck and backwash pool prior to sampling - Sediment accumulates at these locations through grated covers or during bypass flow	Jellyfish StormFilters	Papco / i- STORMWATER	No update (7/6/18) Based on O&M inspection completed 5/14/18 – 5/19/18 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	O&M inspection completed by i-STORMWATER November 29, 2018	No update (01/17/19)	No update (02/25/19)	No update (07/26/19)
8	Installation of Fixed Sampling Points - Rationale Recommended by CONTECH upon reviewing two rounds of initial acceptance testing results - CONTECH recommends fixed sample ports and using pumps for sampling - CONTECH's approach facilitates collection of more	Jellyfish and StormFilters	AECOM/i-STORMWATER	Completed on 5/29/18	No update (7/6/18) Fixed SW sampling points were inspected and blank samples were collected during the Dry Conditions inspection on 9/5/18 and 9/6/18 The SW sampling points were observed to be functioning as intended.	Task completed	No update (12/20/18)	No update (01/17/19)	Fixed SW sampling points to be re-located / re-installed for performance testing in first quarter of 2019	Fixed stormwater sampling points will be re-located / re-installed by Contech during installation of automated samplers in August 2019.

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	representative treated/unreated samples Based on a call with CONTECH technical staff, AECOM prepared a SOW for this installation										
9	Additional Inflow and Effluent Sampling - Rationale: Evaluate performance of individual treatment system components - Results of initial acceptance testing sampling (completed April 2018) may not be representative of system performance due to lack of proper flow to treatment components and difficulty of isolating influent and effluent flows for sampling - Additional samples to be collected using new sampling points once corrective actions identified in Tasks 1-8 are implemented	Jellyfish and Storm/Fillers	AECOM/ CONTECH	To be scheduled for qualifying rain event following completion of Tasks 1-8	No update (7/6/18)	Tasks 1-8 have been completed. SW Sampling is anticipated to be performed during a qualifying rain event in September 2018	Based on field observations during wet weather inspections following completion of system modification under Task 1, further evaluation is needed to confirm design stormwater treatment before proceeding with additional influent and effluent sampling. CONTECH is currently reviewing data and developing potential options to optimize performance at these treatment structures. See new Task 11	It is anticipated that additional sampling will be completed following implementation of proposed optimizations. See new Task 11	No update (01/17/19). See Task 11.	Additional performance testing will be completed following re-installation of fixed sampling points	Additional performance testing will be completed following installation of automated samplers and re-installation of fixed sampling points by ConTech.
10	Flood Treatment Structures to Rinse Fines Rationale: To rinse filters and underdrains of zeolite dust per CONTECH recommendation	Storm/Fillers	Pepco/ i- STORMWATER	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	Pepco completed cleaning/flushing of the storm drain lines on 11/30/18	No update (01/17/19)	No update (02/25/19)	No update (7/26/19)

Task	Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)	Status (as of February 26, 2019)	Status (as of July 26, 2019)
11	Evaluation of the Design to Optimize Operation of StormFilter Systems - Zeolite dust itself has no metals but could adsorb metals - Zeolite dust, if present in effluent, could result in higher effluent concentrations - Re-inspection of stormwater treatment units and components to confirm equipment type and configuration - Investigate water quality inflows to each treatment unit - Initial routing calculations for each structure - Retun 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	All	CONTECH/AECOM	NA	NA	NA	On 10/17/18, CONTECH completed an additional inspection of the StormFilter 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 developing and running a SWMM model for each hotspot and for the system leading to Outfall #13 based on additional data/information provided by CONTECH for their proprietary treatment units. Based on this more detailed modeling, AECOM and CONTECH will develop recommendations to optimize stormwater flow and performance at these treatment structures for a range of storm events up to maximum system design	AECOM has completed running the SWMM 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 hydraulic model, AECOM has developed a set of proposed optimizations to improve stormwater flow splitter performance, and optimize treatment system function. The proposed optimizations are currently with CONTECH for review and determination of compliance with their proprietary treatment units. Further treatment system optimization adjustments will be implemented based on final recommendations from AECOM and CONTECH.	Contech agreed with the adjustments proposed by AECOM and proposed additional adjustments to improve flow management at SF 4. No additional optimizations are recommended by Contech at this time to achieve design treatment. Per the SWMM, AECOM prepared the following adjustments to optimize system performance: - HS1 (SF1) is receiving greater than 100% of the design storm first-flush for treatment. No further adjustments are proposed. - HS2 (SF2) is currently receiving greater than 90% of design storm first-flush for treatment. Raising of weir walls at FS3 and FS4 is proposed to optimize the volume of stormwater being redirected for treatment. - HS3 (SF3A & SF3B) are currently receiving greater than 90% of a design storm first-flush for treatment. Raising the weir wall at FS5, removing flow	On 2/5/19 implementation of the design modifications was completed to optimize system performance as follows: - At HS1- there were no adjustments proposed or completed. - At HS2- the weir walls at FS3 and FSA were raised to optimize the volume of stormwater redirected for treatment. - At HS3- the weir wall at FS5 was raised, the flow restrictor plates to JF3A & JF3B were removed and MAV extensions were added to JF3A & JF3B to optimize the volume of stormwater redirected for treatment. - At HS4 - the weir wall at FSS was raised, hi-lo cartridges were added at JF4, and the overflow assembly invert at SF4 was raised to optimize the volume of stormwater redirected for treatment.	AECOM will oversee the installation of automated samplers by Contech at the 38 individual treatment structures during August 2019. The automated samplers will be programmed to collect influent and effluent stormwater samples during a qualifying storm event once treated stormwater is discharged from a treatment structure. In addition, fixed sampling points will be re-installed as needed by Contech.

Task Recommended Action	Structures	Action Items For	Status (as of June 4, 2018)	Status (as of July 6, 2018)	Status (as of September 7, 2018)	Status (as of October 18, 2018)	Status (as of December 20, 2018)	Status (as of January 17, 2019)	Status (as of February 26, 2019)	Status (as of July 26, 2019)
these treatment structures								resistor plates to JF3A & JF3B, and adding MAW extensions to JF3A & JF3B are proposed to optimize the volume of stormwater that is being redirected for treatment. • HS4 (SF4) is currently receiving greater than 80% of a design storm first-flush for treatment. Raising the weir wall at FS6, adding h/flo cartridges at JF4, and raising the overflow assembly invert at SF4 is proposed to optimize the volume of stormwater that is being redirected for treatment.		

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

Stormwater Management Training

The attached list includes the name of the employees working at Benning who received the Stormwater Management Training during the second quarter 2019.

[illegible]

[illegible]

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

Stormwater Pollution Prevention Plan

The Stormwater Pollution Prevention Plan is currently being updated. The updated plan will be provided to EPA with the next quarterly status report.

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

Change in Management Responsibilities

There was no change in management responsibilities during the second quarter 2019.

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

Status of Completion of Transformer Storage Shed

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

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

Status of Stormwater Retention Project

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

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

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

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

Description of Non-Compliance

Pepco collected samples from Outfall 013 during three storm events on June 2, 13, and 17, 2019. Pepco also collected samples from internal monitoring point 201 (MP 201) on June 2, and 13, 2019. The following is a summary of the sampling efforts and the sampling results are shown in the tables below:

- Pepco collected samples from Outfall 013 and MP 201 on June 2, 2019, and the analytical results showed exceedances of monthly average limits for three metals (Copper, Zinc, and Iron) at Outfall 013 and for total suspended solids (TSS) at MP 201. Pepco could not determine the specific cause of the excursions since it has been aggressively implementing the best management practices at the site which had been effective to achieve full compliance with the permit limits for the previous two quarters. Therefore, Pepco decided to resample for the metals and TSS that exceeded the monthly average limits during the next qualifying storm event to determine if the June 2 sampling results were an anomaly.
- Pepco collected the second samples from Outfall 013 and MP 201 on June 13, 2019. This storm event exceeded 0.1 inch, but occurred approximately 50 hours following the previous 0.1 inch storm (to that point there had been no 72 hour dry periods following the June 2 sampling event). The analytical results showed full compliance for the metals and TSS for which the re-testing was conducted.
- Pepco collected samples during a qualifying storm event from Outfall 013 on June 17, 2019 as part of the sample collection for the NPDES permit renewal application. This sampling included a grab sample which also represented a compliance sample under the permit.
- There were no exceedances of the daily maximum permit limits for any of these three sampling events. However, the monthly average result for Copper exceeded the permit limit, as shown in red below:

Outfall 013 Sampling Results

Analyte	Units	Permit Daily Maximum Limit	Permit Monthly Average Limit	June 2, 2019 sampling results	June 13, 2019 sampling results	June 17, 2019 sampling results	Monthly average sampling results
Copper	mg/L	0.0134	0.00524	0.0134	0.0043	0.0099	0.0092
Lead	mg/L	0.06458	0.0566	0.0126	not sampled	0.0072	0.0099
Zinc	mg/L	0.117	0.073	0.0974	0.0226	0.0603	0.06
Iron	mg/L	1	0.69	0.94	0.19	0.77	0.63
Total suspended solids	mg/L	100	30	10	not sampled	41	25.5

Monitoring Point 201 Sampling Results

Analyte	Units	Permit Daily Maximum Limit	Permit Monthly Average Limit	June 2, 2019 sampling results	June 13, 2019 sampling results	Monthly average sampling results
TSS	mg/L	100	30	35	2.4	18.7

As described in Paragraph 68.a.5 - Status of Stormwater Treatment System, Pepco continues to work with AECOM to ensure the treatment system achieves the pollutant removal efficiency consistent with the design targets to ensure full compliance with the permit limits 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.