



DISTRICT OF COLUMBIA
MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)
ADMINISTRATIVE ORDER ON CONSENT

ANNUAL PROGRAM REPORT - PROGRAM YEAR 3
(OCTOBER 1, 2020 – SEPTEMBER 30, 2021)

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Attachments:

- A. 2021 SWPPP Template
- B. Spill and leak response poster
- C. Automatically generated emails for Corrective Action Forms (14 and 45 day content)

ACRONYMS

AIM	Additional Implementation Measure (2021 MSGP Section 5.2)
AOC	Administrative Order on Consent
BMP	Best Management Practice (SCM)
CAF	Corrective Action Forms produced by the P2 Database
CEI	Compliance evaluation inspections
CMD	Construction and Maintenance Division
COVID	Coronavirus pandemic caused by the 2019 SARS-CoV-2 virus
Critical Source	Critical Source as defined in Section 3.4 of the 2018 District MS4 Permit
CWC	Clean Water Construction Grant Program
DDOT	District of Columbia Department of Transportation
DGS	District Department of General Services
DMOI	District Deputy Mayor for Operations and Infrastructure
DOEE	District Department of Energy and Environment
DPW	District Department of Public Works
EPA	United States Environmental Protection Agency
FEMS	District Fire and Emergency Medical Services
MOU	Memorandum of Understanding
MPD	District Metropolitan Police Department
MS4	Municipal Separate Storm Sewer System
MS4 Permit	2018 District MS4 Permit (NPDES Permit number DC0000221)
MSGP	EPA Multi-Sector General Permit for industrial stormwater runoff
NON	Notice of Noncompliance
NOPN	Notice of Potential Noncompliance
NPDES	National Pollutant Discharge Elimination System
OCA	District Office of the City Administrator
OSSE	District Office of the State Superintendent of Education
P2	Stormwater Pollution Prevention
P2 Database	Stormwater Pollution Prevention Database
Program	Operations and maintenance program established by the AOC
SGS	Surface and Groundwater System
SCM	Structural Control Measure (BMP)
SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
Tier 1	Facilities in the Program that require MSGP coverage due to industrial activities
Tier 2	Facilities in the Program that are Critical Sources and do not conduct industrial activities
UDC	University of the District of Columbia

INTRODUCTION

The District of Columbia Government, through the Department of Energy and Environment (DOEE), submits this report as required by the Corrected Administrative Order on Consent, U.S. Environmental Protection Agency (EPA) Region III Docket No. CWA-03-2018-0019DN (AOC). The AOC was effective on July 3, 2018 to resolve alleged violations of the District's Municipal Separate Storm Sewer System (MS4) discharge permit. The MS4 Permit is issued by EPA pursuant to the Clean Water Act and authorizes the District to discharge stormwater from the MS4 into waters of the United States.

Pursuant to Paragraph 49 of the AOC, the District is required to implement an operations and maintenance program (Program) for municipal facilities in the MS4 permit area. The Program is required to:

- Address operations, maintenance and good housekeeping practices, self-inspection, regulatory inspection (National Pollutant Discharge Elimination System (NPDES) compliance and Best Management Practice (BMP) maintenance inspections), and corrective actions;
- Identify staff and managers responsible for compliance at the facilities;
- Identify and train staff and managers responsible for conducting and tracking self-inspections;
- Specify frequencies for self-inspection of facilities and Stormwater Control Measures (SCMs), also known as BMPs, and for their regular maintenance to ensure stormwater pollution is prevented and good housekeeping is being practiced;
- Share regulatory requirements for tracking self-inspections and corrective actions; and
- Set timelines for completion and implementation of Stormwater Pollution Prevention Plans (SWPPPs) at specified types of municipal facilities in the permit area.

The Program is described in detail in Appendix A of the AOC.

This report is submitted in compliance with paragraph 49.e. of the AOC, which requires the District to submit a periodic Program report to EPA that:

- i. Documents implementation of the Program in the preceding Program Year, which runs from October 1 to September 30;
- ii. Identifies each Program implementation result that was found to be deficient and for each such result briefly addresses causes;
- iii. Describes each action that the District determined to take in order to address each deficiency;
- iv. Includes a summary of the findings of the reporting period's regulatory inspections conducted in the facilities, as required by the Permit;
- v. Includes a summary of recurring maintenance and good housekeeping issues, and how the District's agencies are addressing these recurring issues; and
- vi. Is concurrently posted on the District's website page where the MS4 Annual Reports are posted.

For ease of reference, this report is organized by reference to the requirements of paragraph 49.e. The report addresses the third Program Year, from October 1, 2020, through September 30, 2021. This report is posted on DOEE's website page with the District's MS4 Annual Report (<https://doee.dc.gov/publication/ms4-discharge-monitoring-and-annual-reports>).

PARAGRAPH 49.E.I. PROGRAM IMPLEMENTATION

The Program, as described in Appendix A of the AOC, includes developing an inventory of municipal facilities in the MS4 permit area that are critical sources of stormwater pollution; providing guidance on maintenance of BMPs; creating or updating SWPPPs for each Program facility; developing a strategy for SWPPP implementation through a Pollution Prevention (P2) Database, training, and inspections; and defining agency roles and responsibilities to improve coordination and collaboration. The District's progress on each element is described in greater detail below.

1. PRIORITIZATION OF DISTRICT FACILITIES

DOEE developed and maintains an official inventory for the Program that identifies and prioritizes 35 municipal facilities. The inventory tracks the following data for each facility:

1. Tier and permit type to prioritize critical source facilities:
 - a. Tier 1: Facilities with industrial activities that need Multi-Sector General Permit (MSGP) coverage and their NPDES permit numbers;
 - b. Tier 2: Critical source facilities that do not fall into Tier 1;
2. Potential sources of pollution and site operations;
3. Stormwater Management Plans and SCMs;
4. Contacts: address, Stormwater Pollution Prevention Plan (SWPPP) team leader and members' names and contact information; and
5. Facilities removed from the inventory with justification for why each was removed.

DOEE conducted site walkthroughs at all the Program facilities in the first Program Year to gather information with which to complete the inventory. The official inventory is regularly updated to reflect changes in Pollution Prevention (P2) Program facilities, tier, potential sources of pollution, operations, and contact information. The inventory now includes 35 facilities, of which 25 are Tier 1 and 10 are Tier 2.

During the third Program Year, two new facilities were added to the inventory. The two new sites were identified during the second Program Year, but plans to decommission them changed during the third Program Year. For this reason, they were added to the inventory as Tier 1 facilities. DOEE conducted a site walkthrough at both sites, shared recommendations on temporary control measures, and meets weekly to discuss progress on MSGP coverage and control measure implementation. A third facility, a vacant urban farm owned by the District, was added to the District's Critical Source List but does not qualify as a Program facility. The farm does not qualify because it is currently unstaffed with no operations on site, and because the primary reason it was included on the list was due to an underground groundwater vault that needed repair.

DOEE regularly shares the inventory along with actions necessary at each facility to implement the Program both internally with appropriate Program staff in DOEE and with other District agencies affected by the AOC (Program agencies), the Deputy Mayor for Operations and Infrastructure (DMOI), and the Office of the City Administrator (OCA).

2. STRUCTURAL STORMWATER BMPS

DOEE encourages self-inspection of structural stormwater BMPs at Program facilities. In the first Program Year, DOEE evaluated all Program facilities to identify SCMs onsite, and shared typical maintenance and self-inspection frequencies with agency staff. The P2 Database allowed for electronic tracking of their locations and maintenance status starting in the second Program Year, and in the third Program Year all facilities with SCMs began tracking maintenance in the P2 Database. The database was revised to allow for easier and more accurate tracking of SCM maintenance and inspection. DOEE helped agencies identify over \$10.4

million in additional funding for projects to install new SCMs at Program facilities for storage and vehicle washing infrastructure. DOEE continued to seek additional funding, applying for an additional \$4.2 million project to construct stormwater management and filtration systems.

DOEE connected Program agencies to resources to help them better understand and manage SCMs that are at their facilities. These included sharing engineering plans, coordinating meetings with SCM manufacturers, and connecting Program agencies to DOEE SCM inspectors to discuss disparities between plans and reality. DOEE also provided lists of maintenance contractors in the District, template contract language, and justification for maintenance, and connected Program agencies to other agencies with maintenance contracts to leverage existing resources to improve the frequency of SCM maintenance.

Program facilities with post-construction Stormwater Management Plans (SWMPs) received regulatory preventative maintenance inspections (BMP maintenance inspections), which, according to the Program schedule, are required once every five years. During the reporting period, six facilities were inspected (33 percent of the Program facilities with SWMPs).

DOEE is funding a dedicated, full-time position at the District Department of General Services (DGS) to manage Stormwater Pollution Prevention efforts in accordance to Program expectations. This position was filled during the third Program Year and coordinated SCM inspection and maintenance and manages DGS' stormwater program. DGS is the landlord agency for 89 percent of Program facilities, and program agencies rely on DGS in varying degrees to maintain infrastructure, including SCMs, at their facilities. Additional information on the Memorandum of Understanding (MOU) between DOEE and DGS to establish this position can be found in Section 8, District Agency Roles and Responsibilities.

3. STORMWATER POLLUTION PREVENTION PLANS (SWPPPS)

DOEE has consistently met with all agencies responsible for Program facilities since the first Program Year to regularly develop, update, and finalize SWPPPs. During the third Program Year, DOEE updated the Program's Template SWPPP to comply with the 2021 MSGP that came into effect March 1, 2021 (See attachment A) and held a workshop on how to utilize the SWPPP review checklist to ensure SWPPPs stay up-to-date and relevant to current facility operations. The P2 Database was updated to allow new SWPPPs to be automatically completed using data in the database and certified online. DOEE provided two live, online trainings on how to utilize this new function that together had a total of 24 attendees. Of the 35 total critical source facilities requiring SWPPPs, 33 have certified, up-to-date SWPPPs. The remaining two facilities were in the process of uploading data into the P2 Database in order to develop SWPPPs and successfully certified them on November 3, 2021.

During the third Program Year, 28 new SWPPPs were developed, of which 25 were created using the template SWPPP in the P2 Database. DOEE conducted three annual SWPPP reviews using a SWPPP review checklist to ensure the SWPPPs met MS4 Permit and MSGP requirements, where applicable, and began to update the SWPPP review checklist to include the 2021 MSGP requirements. The updated SWPPP review checklist is anticipated to be completed early in the fourth Program Year.

DOEE made a third-party contractor available to assist several agencies with SWPPP updates required by the 2021 MSGP, including the Department of Public Works (DPW) and the District Department of Transportation (DDOT). These efforts included investigating discharge points, updating facility maps, tracking SCMs, and drafting new SWPPPs. Throughout the process DOEE provided guidance and feedback on SWPPP elements.

4. SWPPP IMPLEMENTATION

I. P2 Database

DOEE continues to work with DGS to maintain and improve a P2 Database for Program agencies to track SWPPPs, housekeeping, and self-inspections. DOEE focuses efforts on both developing and refining the P2 Database, and ensuring necessary staff has access and the training to utilize it. DOEE held 68 P2 Database-related events, including meetings, trainings, and site walkthroughs, which reached 231 people.

DOEE's primary goal during the third Program Year was to ensure all Program facilities were utilizing the P2 Database to track SWPPP implementation and to make the application more user-friendly. Specific improvements to achieve this goal included:

1. Electronic signature function for self-inspections, SWPPP modification log, and corrective action forms that is legally the same as a pen-and-ink signatures;
2. Fields and features to track new 2021 MSGP requirements not already in the P2 Database, including indicator monitoring, Additional Implementation Measures (AIM) levels, and major storm event control measures;
3. Aging field for corrective action forms that count the number of days each has been open with a trigger for automatic email notifications at 14 and 45 calendar days. The notifications are sent to the SWPPP team leader and include step-by-step instructions on what actions and reporting are required for Tier 1 and Tier 2 facilities;
4. Ability for corrective action forms to be created from and be associated with inspection and monitoring reports, and for new corrective action forms to be linked to existing forms so duplicative forms are minimized;
5. New SCM maintenance log to track and develop reports for maintenance activities, and new "inspection frequency" field associated with SCMs to track inspection needs;
6. Developed scope to connect P2 Database with DOEE Surface and Groundwater System (SGS) to allow for easy access to SCM details and inspection reports with expected completion during the fourth Program Year;
7. Unauthorized Non-stormwater Discharge Inspection form; and
8. Automation of SWPPP Attachment Flow, which auto populates a revised SWPPP Template using data stored in the P2 Database and allows for electronic certification.

DOEE's second goal during the third Program Year was to support employees at Program facilities in accessing and utilizing the P2 Database for tracking and entering data on SWPPP implementation. During the third Program Year, DOEE ensured the data was correctly entered, and set up agency dashboards to assist leaders in identify agency-wide needs. DOEE enters employee annual stormwater training data into the P2 Database, including results from the online training module. DOEE held 14 trainings to familiarize and train staff to use the P2 Database and provided support by phone, virtually, and in-person to facilitate use of the database by staff managing SWPPPs at Program facilities.

DOEE procured 43 tablets in the second Program Year and has distributed a majority of them to sister agencies to allow stormwater program managers to access the P2 Database in the field. These tablets remain a resource for the Program, with additional tablets available to support new SWPPP team members and DOEE staff.

During the reporting period, 33 of the 35 critical source facilities utilized the P2 Database to track SWPPP implementation in some way. The remaining two facilities were in the process of uploading data into the P2 Database in order to develop SWPPPs.

P2 Database Utilization Type	Number of Facilities Utilizing	Number of Agencies Utilizing	Number of Entries in FY2021
1. Routine Self-inspections	33	8	470
2. Quarterly Visual Assessment Inspections	25	4	129
3. Analytical Monitoring	3	3	36
4. Stormwater BMP Maintenance	28	7	88
5. Corrective Actions	32	8	324
6. Employee Training Records	32	8	237
7. SWPPP Modifications	30	8	210

II. Employee Training

In the first and second Program Years, DOEE communicated training requirements, developed a Stormwater Pollution Prevention Online Training Module and other training materials, conducted trainings, and tracked training-related compliance of all SWPPP team members. DOEE tracks SWPPP team members that need training in the P2 Database and with the online training module.

In the third Program Year, DOEE provided 68 trainings that reached at least 768 people, including stormwater training for facility staff and snowplow operators. Of these training events, 28 were educational site walkthroughs and mock inspections that reached 79 people. The walkthroughs at facilities specifically provided one-on-one training to SWPPP team members on how to conduct self-inspections, identify issues, take corrective action, and use the P2 Database. Due to the on-going COVID-19 public health emergency, DOEE continued to encourage SWPPP team members to utilize the online training module. The Stormwater Pollution Prevention Online Training Module is a 25-minute video that is followed by a 10-question quiz with one bonus question that is designed to satisfy the O&M Plan yearly training requirements. In total, 206 employees successfully took and passed the online training module. DOEE uploads the results from the training module into the P2 Database quarterly to track that all SWPPP team members have met annual training requirements.

By the end of the third Program Year, 73 percent of facilities had met all annual stormwater P2 training requirements for their staff. Of those facilities that need additional staff training, seven facilities have all but one SWPPP team member trained, and one facility has half of its team members trained. DOEE is actively coordinating with Program agencies to achieve full compliance with the training requirements. As of September 2021, all but nine employees District-wide are current with annual stormwater training requirements. Of those nine, eight are SWPPP team members and one manages stormwater compliance efforts at a Program agency.

DOEE provided topic-specific training to staff at Program facilities in order to impart the knowledge and skills necessary to implement facility SWPPPs. Topic-specific training included a training with DOEE's Chief of Emergency Response to train employees from the District's municipal solid waste transfer stations on how to identify hazardous materials and how to respond to spills and leaks. The five-hour training included a classroom portion and a field portion. The field portion comprised exercises to practice how to properly store material and manage secondary containment; manage leaky vehicles, properly use drip pans, enter spills and leaks in the P2 Database, contain and cleanup spills using a spill kit, and identify hazardous materials. The field portion was videotaped for use in future trainings. In addition, DOEE hosted a training on how to complete the SWPPP review checklist, and another training on the annual report requirements of the 2015 MSGP.

During the fourth Program Year, DOEE plans to update training resources, an effort that started during the third Program Year. This effort includes revising the online stormwater training module to include new training requirements in the 2021 MSGP, to incorporate the P2 Database, and to have more detailed instructions on spill and leak response and reporting.

Training Topic	Number of Events	Number of District Staff Trained
1. Compliance with Stormwater Regulations	6	26
2. MSGP for industrial stormwater runoff	2	5
3. P2 Database	14	155
4. P2 for Snow Operations	17	230
5. Site Walkthroughs and Mock Inspections	28	79
6. SWPPP Development	1	13
Total	68	768

III. Corrective Action

During this reporting period, DOEE continued to clarify expectations for taking corrective actions when potential violations are identified during self- and regulatory inspections (NPDES compliance and BMP maintenance inspections). With the P2 Database now online, corrective action forms are immediately and easily created as SWPPP team members conduct self-inspections and enter monitoring data. The P2 Database was updated to include an aging field for each corrective action form to allow staff to understand how many days old it is, and an automatic email notification feature was added that sends clear instructions on recordkeeping and reporting requirements on day 14 and on day 45 if a corrective action form remains open, which signifies the issues has not yet been resolved.

DOEE provided regulatory inspection reports to Program facilities and offered compliance assistance or initiated enforcement when violations were found. DOEE coordinated with DGS to post signs visible from the public right-of-way at 33 Tier 1 facilities. The signs have information on SWPPP availability and how to report non-compliance to EPA, as required by the 2021 MSGP. DOEE also designed and purchased 30 signs to post at spigots at Program facilities reminding staff that no outdoor washing is allowed of vehicles and equipment and providing contact information for staff that can provide guidance on alternatives.

DOEE made its contractor available to three agencies to assist with managing stormwater programs, including implementing corrective actions. Activities included improving SWPPP implementation practices, such as good housekeeping and BMP maintenance, and a source tracking project to identify sources for benchmark exceedances. Larger projects included a study to identify sources of benchmark exceedances at five Program facilities, assisting with the design and installation of structural controls, MSGP monitoring, and temporary controls for two sites that were added to the inventory. A spill and leak response poster was developed and posted at 15 facilities and a smaller version posted in fleet vehicles parked at the sites (See attachment B). All activities assisted agencies with taking corrective action to prevent stormwater pollution.

The Program provided expertise for acute compliance assistance needs. During the third Program Year, the team assisted two agencies with notices they received from EPA, including one notice of non-compliance (NON) and three notices of potential non-compliance (NOPN). DOEE met weekly with the agencies to address concerns at the facilities and to review content before it was submitted to EPA. The Program also helped agencies with how to respond to and report two instances of illicit discharge and two fires at program facilities. In addition, the Program clarified requirements for reporting anticipated and current non-compliance and taking corrective action if monitoring identified pollution in facility discharges.

5. REGULATORY INSPECTIONS

During the reporting period, DOEE conducted four regulatory compliance monitoring inspections of program facilities. Facilities subject to regulatory compliance monitoring inspections include facilities in the MS4 critical source inventory and facilities covered by the NPDES Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity.

6. DISTRICT AGENCY ROLES AND RESPONSIBILITIES

DOEE established a P2 Team to oversee Program implementation. The team consists of three members, two of which are primarily dedicated to the Program and one of which splits their time with other programs. Together, they coordinate Program efforts, provide individual and personalized compliance assistance to Program agencies and their staff, and track Program implementation. The P2 Team meets weekly to discuss implementation and strategies for success to best meet Program goals. Every Program facility is assigned a P2 Team member as their main point of contact for the Program to simplify communication, to identify training, funding, and other needs, and to provide compliance assistance for local and federal stormwater regulations.

DOEE worked closely with other Program agencies to ensure facilities have the resources and information needed to implement the Program during the third Program Year. Efforts include the following:

Type of Outreach	Number of Events	Number of People
Meetings (in-person and virtual)	239	1,566
Training*	40	689
Walkthrough	28	79
Correspondence (substantial calls and emails)	38	90
Total	345	2,424

* Training total does not include the number of walkthroughs

To date, DOEE has conducted site walkthroughs at all the Program facilities. In the third Program Year, DOEE conducted 28 site walkthroughs. During these walkthroughs, DOEE walked the facility with site staff and identified and discussed potential pollutant sources and any corrective actions that were needed.

The Program tracked staff members responsible for compliance with the Program at all Program facilities in the P2 Database. DOEE met at least monthly with four of the eight agencies responsible for 27 of the Program facilities (81%). DOEE met with the remaining four agencies at least quarterly.

DOEE coordinated quarterly internal and District-wide meetings to track progress, discuss possible deficiencies, and identify ways to leverage resources and efforts to be successful in implementing the Program. District-wide meetings included facility managers and their supervisors, and topics such as expectations of the Program, BMP maintenance, managing onsite contractors, and funding strategies were discussed. Information about the 2021 MSGP was also shared. Starting in June 2019 and continuing through the third Program Year, DOEE provided each agency with at least quarterly updates summarizing Program progress and identifying actions that would be required of them.

The Program also engaged supervisors, agency directors, the City Administer, and the Mayor's Office to build understanding and support for the Program. The DOEE Director regularly included P2 requirements, action items, and updates in his quarterly meetings with DGS, DPW, and DDOT Directors, and in his monthly meetings with the President of the University of the District of Columbia (UDC). DOEE successfully recruited additional members associated with the Program from DGS, DPW, and DDOT to

attend the monthly MS4 Permit Technical Working Group, which is an interagency group that collaborates on the implementation of the District MS4 Permit.

During the reporting period, DOEE developed and executed agreements with other Program agencies to fund one full-time staff person that assists with the implementation of the Program. DOEE executed an MOU with DGS on November 13, 2019 to fund a full-time stormwater expert to manage DGS's stormwater program and coordinate SCM maintenance at DGS-managed facilities. The MOU was extended into the third Program Year and the position was filled in January 2021. DOEE also made contractor support available to DGS, DPW, District Fire and Emergency Medical Services (FEMS), and District Office of the State Superintendent of Education (OSSE) to maintain control measures, input facility information into the P2 Database, and navigate the 2021 MSGP Notice of Intent (NOI) application process. DOEE established and revised MOUs with DPW and DGS to fund construction projects that will install much-needed stormwater infrastructure at Program facilities, and DOEE purchased equipment and spill kits for UDC to allow for proper outdoor storage and spill and leak response.

PARAGRAPH 49.E.II TO III. PROGRAM DEFICIENCIES AND ACTIONS TO CORRECT

This section identifies each Program implementation result that was found to be deficient, briefly addresses the causes, and describes each action that the District took in order to address each deficiency.

1. PRIORITIZATION OF DISTRICT FACILITIES

No deficiencies were found for the prioritization of District facilities. All Program facilities have been visited and prioritized in the official inventory. The official inventory is updated whenever new information becomes available and is reviewed at least once a year to ensure it is up-to-date. DOEE is using the P2 Database to track the official inventory, including updating contact information on SWPPP team members, along with a separate spreadsheet with information on facilities removed from the inventory. DOEE will continue to review the inventory at least once a year to ensure facilities information is up-to-date and to determine if there is a need to add or remove facilities from the list.

2. STRUCTURAL STORMWATER CONTROLS

Required maintenance of structural stormwater BMPs installed at Program facilities is improving; however, the completion of routine maintenance according to the approved SWMP's schedule is an ongoing challenge. During the latest reporting period, four (4) of the six (6) compliance monitoring inspections found BMPs in poor condition and requiring maintenance.

Causes: DOEE identified several reasons why some SCMs are not regularly maintained.

1. Agencies managing program facilities remain in a reactionary posture and do not establish a consistent schedule for routine maintenance. Program facilities successfully maintained their SCMs during the first half of the third Program Year but did not complete any further routine maintenance as required by the approved SWMP.
2. Agencies did not have sufficient funding or maintenance contracts to address the required maintenance frequency as defined by the approved SWMP. Subsequently, maintenance activities often required a new procurement action, which delayed service.
3. Agencies are still unfamiliar with the structural stormwater BMPs installed at their facilities and are unaware of their function and necessary routine maintenance.
4. The P2 Database has improved DOEE's and sister agencies' ability to track maintenance needs and maintenance efforts. The improved tracking of maintenance by the P2 Database resulted in an improved ability to detect deficiencies.

Actions: DOEE continues to work with Program agencies to improve structural stormwater control maintenance by clarifying expectations and necessary actions. The Program has notified each facility of the known SCMs located on site, any stormwater management plans associated with the SCM, and required maintenance frequency and costs. DOEE has cross-referenced the SWMPs with the SCMs entered into the P2 Database to ensure all SCMs are tracked and included in SWPPP implementation measures. The District updated the P2 Database to improve SCM management including i) adding an inspection frequency field to each SCM; ii) prioritization system for Program work orders; iii) new maintenance log; and iv) exploring how to connect it to the Surface and Groundwater System (SGS). In addition, DOEE ensured facility site maps included the correct locations of BMPs and appropriate maintenance and self-inspection schedules and procedures when providing SWPPP reviews, and routinely shared a list of general recommendations for frequency of self-inspection and maintenance for stormwater BMPs commonly found at Program facilities.

DOEE continues to clarify the requirements of SWMPs at Program facilities. Many facilities do not have access to their engineering plans or the final as-built plans for their sites, so DOEE continues to provide any plans that are available through the SGS. When necessary, DOEE connects the facilities to the Construction and Maintenance Branch (CMB) that inspects SCMs to clarify what is installed. For example, one Program facility has thirteen bioretention swales on their engineering plans, but they appear to have been built and maintained as grassy swales. With no as-built plans available, there was no clear direction on how the swales should be maintained, so they met with CMB to determine whether they should rebuild the swales as bioretention areas or continue to maintain grass swales. DOEE also advocated for the regular maintenance of SWMP elements, including inlet filters and street trees, that were not being recognized as part of the facility's plan.

The P2 Database is improving the management of BMPs at Program facilities. SWPPP team members are now able to use mobile devices to find the location of SCMs on site and track self-inspection and maintenance activities. The P2 Database is used to identify a facility that missed SCM routine self-inspections and maintenance activities and better anticipate when these activities are due. Program agencies receive quarterly reports with known maintenance needs and anticipated needs for the upcoming quarter. Work order requests for SCM maintenance are automatically submitted, prioritized, and tracked through the database, making notification of appropriate staff quick and easy.

See section 6.I. below for information on what the District is doing to ensure adequate funding for SCM maintenance.

3. SWPPPS

There has been a great improvement in the number of facilities that have SWPPPs since the start of the Program, but deficiencies remain around SWPPP reviews, especially among Tier 2 facilities. Tier 1 facilities did not have the same deficiency because of the 2021 MSGP, which required SWPPP updates to be completed prior to submitting a notice of intent for coverage. All facilities on the official inventory, except for the two newest additions, have a certified SWPPP, but four agencies did not conduct an annual SWPPP review. Despite this, their SWPPPs continue to be largely up to date thanks to the P2 Database, which is being used to track SWPPP updates. The annual SWPPP checklist is working as expected when it is used and was updated in the fall of 2021 to incorporate new 2021 MSGP SWPPP requirements.

Causes: Tier 2 facilities are not consistently conducting annual SWPPP reviews within 12 months of their SWPPP being last reviewed or certified. This is due to a lack of prioritization, staffing shortages, and high turnover at the sites. Many facilities are understaffed, so in addition to turnover in SWPPP team leaders, remaining staff have decreased capacity to dedicate to SWPPP reviews.

Actions: DOEE provided quarterly reports that identified when each Program facility's annual review was due along with a link to online resources to help them complete the District's annual SWPPP review checklist. The Program also emailed facility and agency stormwater leads at least a month prior to the annual review being due and once the deadline was missed. The Program developed a guide on how to complete the SWPPP review checklist that was made available online, and hosted an hour and a half-long workshop, titled "SWPPP Review and MSGP Annual Report Workshop," on December 15, 2020 that was attended by 13 District employees.

The Program worked to elevate SWPPP review requirements by raising them during other Program-related meetings with Program agencies. In some cases, DOEE set up an in-person meeting to review SWPPPs together and reviewed SWPPPs for non-responsive agencies.

The P2 Database allows the Program to track staff turnover, and DOEE reaches out to any new SWPPP team leader about annual review requirements and protocols.

The two newest facilities that were added to the Program Inventory have begun to develop their SWPPPs using the P2 Database,

which now automatically completes a Template SWPPP through a “SWPPP Attachment Flow” function. Information on the two locations is being entered into the P2 Database. DOEE anticipates the two facilities will have certified SWPPPs before December 30, 2021.

4. SWPPP IMPLEMENTATION

I. General Implementation

Some facilities are still working to fully implement their SWPPPs.

Causes: The Program continues to build knowledge and proficiency among facility staff on stormwater P2, including expectations and responsibilities of SWPPP team members. While there has been general improvement in understanding, it has not always translated into action on the ground. Some facilities are still working to purchase the tools and materials needed to implement their SWPPP, such as secondary containment and storage containers. During the reporting period, there has been a high turnover of personnel at affected agencies and facilities.

Actions: DOEE expects housekeeping and storage practices to improve as personnel become more familiar with their facility’s SWPPP and how to implement it. DOEE anticipates an improvement once in-person trainings and site walkthroughs resume more broadly, as they provide the opportunity for staff to have first-hand experience translating what they learned during annual stormwater training into action. With these efforts, DOEE expects to see noticeable improvements in the fourth Program Year.

The P2 Database is making it easier to track SWPPP implementation. Facility and program managers can now track SWPPP implementation remotely, respond to corrective actions, and better manage competing needs across an agency’s Program facilities. SWPPP teams can now submit work order requests in the field and more easily record efforts to inspect and maintain control measures through self-inspections and maintenance reports. These reports build in transparency and personal responsibility that will allow facilities to more effectively implement SWPPPs and understand any deficiencies that are present. Managers are automatically notified by email when corrective action forms are created.

DOEE is also providing contractor support to four agencies to assist them with updating information in the P2 Database, maintaining BMPs, general SWPPP management, and good housekeeping. These efforts include a source tracking project to identify the causes of benchmark monitoring exceedances at five sites, assistance with permit coverage and reporting, and onsite SWPPP team training on self-inspections and good housekeeping.

In the spring of 2018, DOEE applied for Clean Water Construction (CWC) Grant funding to address storage and vehicle washing needs at Program facilities. The project has now begun, and over \$10.4 million in funding is available to install the storage infrastructure. DOEE anticipates these improvements will assist Program facilities with general SWPPP implementation by providing the infrastructure needed to store potential pollutants in a way that prevents contact with stormwater. During the third Program Year, DOEE applied for an additional \$4.2 million from CWC for stormwater management, including stormwater conveyance and treatment systems, in anticipation of the new AIM requirements of the 2021 MSGP.

II. P2 Database

Several elements in the P2 Database make tracking of SCM and monitoring data at Program facilities difficult. New SWPPP team members must undertake a significant level of training in order to effectively utilize the P2 Database.

Causes: New requirements in the P2 Database and increased usage of the P2 Database of SCM maintenance made it apparent that the SCM maintenance and the analytical monitoring data entry functions needed improvement. Originally this information was captured by uploading documents and updating the “Notes” field.

Actions: DOEE worked with DGS to set up a new SCM maintenance inspection form, in August 2021, to allow maintenance information to be more easily tracked. The new form auto-populates the features entered in the P2 Database for the facility and includes a separate field for the date of maintenance, allowing reports to be easily run and shared with Program agencies and SWPPP teams.

DOEE is also working with DGS to improve the tracking of analytical monitoring in the P2 Database. Prior to the new 2021 MSGP, only five facilities needed to track benchmark monitoring. The new permit now requires indicator monitoring and a new level of impaired waters monitoring for Project facilities with MSGP coverage. DOEE and DGS updated the database to reflect these changes and drafted a process flow through which monitoring results can more easily be entered and tracked. New monitoring data entry flow is expected to be published in the fourth Program Year.

DOEE is developing a self-guided, online P2 Database training module to assist with training staff on how to utilize the application. There will be five modules, each of which will be geared towards a different subset of actions in the database. For example, one module will be on how to successfully complete a self-inspection using the P2 Database whereas another module will be on how to enter SCM maintenance data. Work on the module began during the end of the third Program Year and is expected to be completed during the fourth Program Year.

III. Employee Training

The District is largely in compliance with the employee training requirement, but a few Program facilities have allowed SWPPP team members' compliance to lapse. Eight existing SWPPP team members did not receive training within twelve months after the last stormwater training they attended. Eighty-eight percent of the facilities had SWPPP team members fully up to date with annual stormwater training by the end of the third Program Year (September 2021).

Causes: Program facilities struggled to keep up with training requirements primarily due to personnel turnover. Turnover included both Facility Managers and SWPPP team members. With staff turnover, the Program noticed some Program facility SWPPP teams failed to update the P2 Database of staff changes and thus were not captured by the Program as needing to be trained.

Actions: The online training module allows members to more easily stay in compliance. New SWPPP team members can also utilize the training module when they are added to the team so that they can take the training as soon as possible after being assigned to the team. DOEE has asked new SWPPP team members to complete the training module within 90 days (one quarter) of being added to the team, to better clarify what needs to be done when new members are added.

DOEE sent Program agencies quarterly reports during the third Program Year that listed employees who needed training and those anticipated to need training during the next quarter. This allowed Program managers to anticipate training needs and ensure their staff takes appropriate action to remain in compliance.

Program SWPPP team leads were trained on how to complete the SWPPP modification log in the P2 Database during the May 21, 2021 P2 Database training, so they understood how to modify their SWPPP team in event of staff turnover. In addition, Program facilities were reminded to update the P2 Database to reflect changes to their SWPPP team whenever a quarterly training evaluation suggested members needed training.

IV. Corrective Action

DOEE implemented the proposed corrective action strategy as outlined by the Program document. SWPPP team members became much more proficient at identifying and reporting issues in the P2 Database and addressing corrective actions. There was also a marked improvement on the timeframe within which issues were corrected. However, District procurement processes and scarcity of funding led to many corrective actions remaining unaddressed for over 45 calendar days.

Additional information on strategy specifics are included in paragraph 49.e.i., section 4.III (p. 9); in paragraph 49.e. ii to iii., sections 1-4 (pp. 11 – 16); and in paragraph 49.e.v. (p. 18).

Causes: The tracking of corrective actions increased dramatically as facilities became familiar with, and proficient at, utilizing the P2 Database for self-inspections, spill and leak reports, and other aspects of SWPPP implementation. This was due to staff more easily identifying when a corrective action was needed, and also to corrective action forms being automatically created when issues were identified.

During the reporting period many corrective action forms were created but not closed out within 14 calendar days or within 45 calendar days. District procurement processes and lack of funding dedicated to stormwater maintenance led to many corrective actions taking months to address.

Actions: This issue improved throughout the third Program Year as staff and managers become more familiar with the P2 Database and how to take corrective action. DOEE and DGS worked on improving P2 Database functionality around corrective action forms and their management. This included revising the self-inspection forms so that corrective action reports do not have to be automatically generated if the SWPPP team member addresses the issue immediately, for new corrective action forms (CAFs) to be linked to existing CAFs if an issue persists and generating automatic emails with clear instructions for addressing and reporting the corrective actions at 14 and 45 calendar days (email content in attachment C). These updates helped minimize the number of repetitive corrective action forms (i.e. forms being generated for the same issue) and minimized data entry fatigue while in the field.

DOEE provided training to facility staff and managers on how to close out and manage corrective actions on October 21, 2020 after recognizing the number of open corrective action forms could become a problem. This was followed by several agency-specific meetings to go over how to manage CAFs and additional information shared during monthly P2 Database trainings. DOEE also shared information on the number of open corrective action forms in the P2 Database with agency stormwater leads and managers on a quarterly basis so agencies can better track progress, advocate for additional support to take corrective action, and to better identify efficiencies across Program facilities. The Program also worked closely with Tier 1 facilities to clarify and remind them of MSGP reporting requirements, and to provide feedback and encouragement when corrective actions had to be reported to EPA Region 3.

Work orders sent from the P2 Database were at first not being prioritized, but once DGS hired the stormwater expert that DOEE funded, work orders associated with Program facilities were prioritized to help ensure they were met within an appropriate timeframe.

The Program encourages facilities to establish a routine budget to cover stormwater-related costs, including equipment, SCM maintenance, and spill and leak response material. DOEE provided equipment to Program facilities, including secondary containment pallets, sheds, tarps, and cabinets, to help address ongoing outdoor storage needs. This was done both through direct procurement and through MOUs with Program agencies. DOEE also applied to funding for stormwater management, including conveyance, diversion, and filtering infrastructure, to allow Program facilities to take corrective action more quickly and within an appropriate timeframe, especially for Tier 1 facilities that may need to meet the 2021 MSGP AIM Level 3 deadlines. DOEE also provided draft contract and procurement materials and justifications to support approval of expenditures needed to address corrective actions, including the removal of an exposed pile of construction and demolition waste.

5. P2 PROGRAM REGULATORY INSPECTION

DOEE conducted four regulatory compliance monitoring inspections during the third Program Year. Of the four inspections conducted, deficiencies were identified at three facilities.

Causes: Deficiencies documented at MS4 permit facilities were minor and considered the result of failure by facility staff to employ proper house-keeping procedures. DOEE found the deficiencies documented at the facilities covered by the MSGP are the result of failure by facility staff to implement all elements of the approved SWPPP.

Actions: DOEE conducts closing conferences at the end of each inspection. During the closing conference, DOEE presents the observed and documented deficiencies, provides suggestions for improvement, and issues required corrective actions. Required corrective actions are documented in DOEE Inspection and Corrective Action forms and/or detailed in emails to facility representatives.

6. OVERARCHING INFLUENCES

DOEE identified two factors that affected Program implementation: 1) a need for improved budget planning and 2) behavior change among facility staff. Below is a description of the actions the District is taking to address these two factors.

I. Agency Budgeting for BMP Maintenance

In the first two Program Years, DOEE supported other agencies to identify resource needs through site walkthroughs, site mapping, and other activities. DOEE helped develop maintenance budgets and proposed a budget enhancement for these efforts through the Office of the City Administrator, the Deputy Mayor for Operations and Infrastructure (DMOI), and the Executive Office of the Mayor. DOEE also coordinated with other Program agencies on submitting budget requests. Due to the on-going COVID-19 public health emergency, the budget enhancement and individual agency funding requests were not funded. However, DOEE was able to support other agencies through other sources of funding including the CWC and the Stormwater Enterprise Fund. This included support to DGS to fund a full-time employee that is an expert on stormwater permit compliance and to UDC to fund interns to assist with developing SWPPPs and to coordinate annual stormwater training at the three UDC Program facilities. In addition, DOEE made a contractor available to DPW, DGS, and OSSE to assist with implementing agency stormwater programs.

During the third Program Year, DOEE made funding and resources available to agencies with Program facilities to assist them with meeting Program requirements. This included continuation of the DGS MOU to fund a full-time stormwater employee and critical updates to the P2 Database. Finally, DOEE awarded a CWC grant called Pollution Solutions to support P2 implementation at several Program agencies.

II. Behavior Change

Behavior change is an on-going challenge. Through the implementation of the Program, DOEE supports agencies to improve performance by conducting on-going trainings on good housekeeping best practices and how to use the P2 Database, by conducting site walk-throughs and mock inspections, and by holding meetings to discuss progress and financial support. Even so, DOEE continues to see a need for improvement of stormwater activities at Program facilities. In the fourth Program Year, DOEE will continue to emphasize the importance of on-the-ground improvements, good housekeeping, on-going training, and budgeting for maintenance, and will look for ways to improve staff compliance.

PARAGRAPH 49.E.IV. SUMMARY OF REGULATORY INSPECTIONS

1. NPDES COMPLIANCE EVALUATION INSPECTIONS

Since October 1, 2020, DOEE performed two regulatory NPDES compliance evaluation inspections (CEIs) of municipal facilities. Of the two inspections conducted, one facility was found in good condition, and one was found in fair condition. Inspectors observed and documented deficiencies in the facilities' BMP inspection and maintenance procedures. These inspection and maintenance procedures are required in the facility SWMP and SWPPP.

Twenty-two of 25 facilities have obtained coverage under the MSGP.

2. BMP MAINTENANCE INSPECTIONS

Since October 1, 2020, DOEE conducted compliance monitoring inspections of structural BMPs installed at six program facilities. Of the six inspections conducted, two of the inspections observed and documented BMPs in good condition, and four inspections found BMPs in poor condition.

As described in the following section, DOEE is working with Program agencies to correct deficiencies documented at facilities found in poor condition.

PARAGRAPH 49.E.V. RECURRING MAINTENANCE AND HOUSEKEEPING ISSUES

DOEE has observed an overall improvement in housekeeping practices; however, further improvements are needed, including the implementation of new control measures and procurement of storage and other solutions. As noted below, DOEE continues to collaborate with sister agencies to fund and implement needed improvements.

DOEE shared the available stormwater management plans with agencies responsible for Program facilities during the first Program Year and continues to share them as requested. These plans include the relevant engineering plans, maintenance requirements, and maintenance schedules. To further assist these agencies with BMP maintenance, DOEE provided standard self-inspection and maintenance schedules for common BMPs installed at Program facilities and provided standard and agency-specific language for maintenance contracts to assure compliance with District and federal regulations. Maintenance schedules for SCMs have been incorporated into the P2 Database for easy reference and to more easily track and record maintenance activities. DOEE has cross-referenced P2 Database entries with known SCMs included in plan sets and identified additional changes that are needed. These changes are needed due in part to a lack of understanding of the stormwater management plans, missing as-built engineering plans, and other factors.

DOEE made its third-party contractor available to DPW, OSSE, and FEMS to assist with maintaining BMPs on site and removing legacy pollutants that had built up in inlets and other locations. DOEE has also provided funding to DPW to install new SCMs at several locations and is in the process of procuring practices for five other agencies in collaboration with DGS as part of a \$10.4 million capital project funded by the CWC. These efforts include leveraging funding from DOEE's Energy Administration to install solar canopies to protect large trucks.

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly 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 am aware that there are significant penalties for knowingly submitting false information, including the possibility of fines and imprisonment for knowing violations.



Jeffrey Seltzer, PE

Deputy Director

Natural Resources Administration

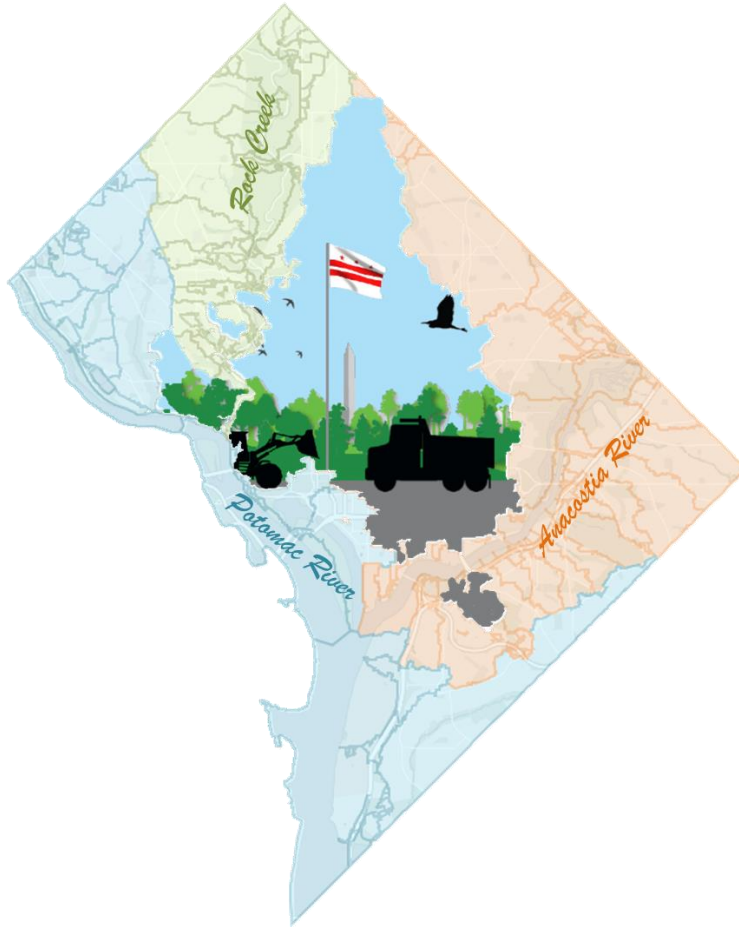
Department of Energy & Environment

O&M PLAN ANNUAL REPORT ATTACHMENTS

- A. 2021 SWPPP Template
- B. Spill and leak response poster
- C. Automatically generated emails for Corrective Action Forms (14 and 45 day content)

Attachment A. 2021 SWPPP Template

Fields highlighted in yellow are automatically populated by the P2 Database using information and selections entered by Program agencies.



Stormwater Pollution Prevention Plan

for:

Facility Name

Building Address

Building ID

SWPPP Preparation Date:

___/___/___

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ACRONYMNS:

AIM- Additional Implementation Measures

BMPs- Best Management Practices

CERCLA- Comprehensive Environmental Response, Compensation, and Liability Act

CSS- Combined Sewer System

DGS- District's Department of General Services

DOEE- Department of Energy and Environment

EPA- U.S. Environmental Protection Agency

IED- DOEE's Inspection and Enforcement Division

MSGP- Multi-Sector General Permit

MS4- Municipal Separate Storm Sewer System

NHPA- National Historic Preservation Act

NetDMR- Network Discharge Monitoring Report

NeT-MSGP- NPDES eReporting tool for the MSGP

NOI- Notice of Intent

NPDES- National Pollutant Discharge Elimination System

NSBMP- Nonstructural Best Management Practice

O&M Plan- District's Operations and Management Plan

P2 Database- Pollution Prevention Database

SBMP- Structural Best Management Practice

SIDP- Substantially Identical Discharge Points

SWMP- DOEE Stormwater Management Plan

SWPPP- Stormwater Pollution Prevention Plan

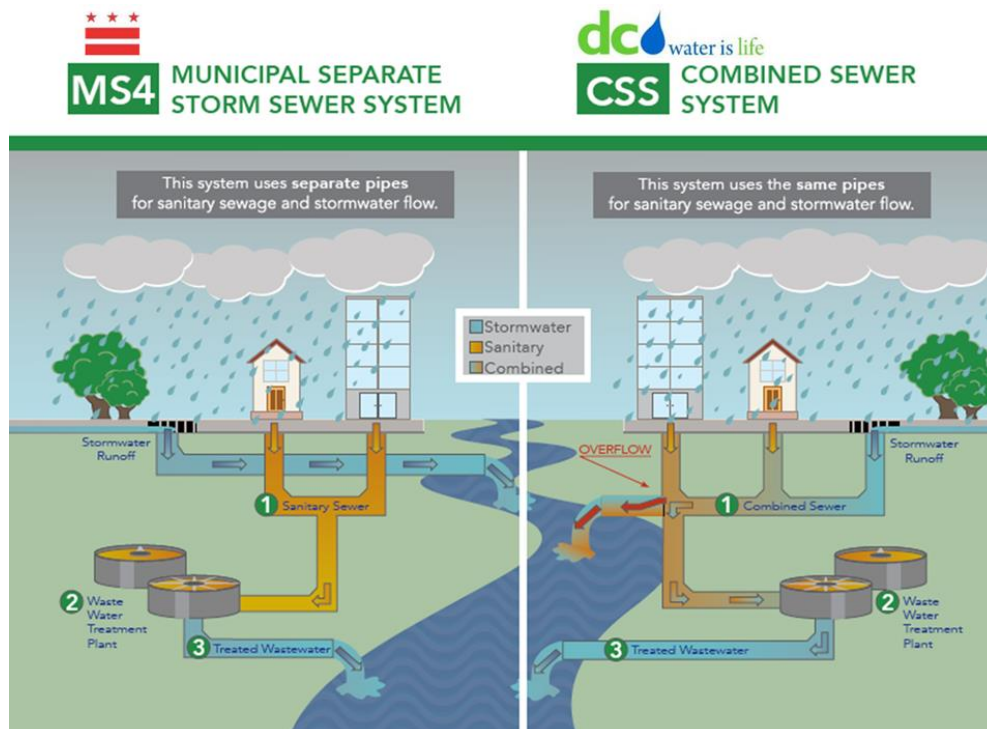
SWPPT- Stormwater Pollution Prevention Team

TMDLs- Total Maximum Daily Loads

INTRODUCTION:

Stormwater is rainfall or snowmelt that does not soak into the ground but flows off hard surfaces downhill into storm drains or the nearest waterbody. This water can run off rooftops, driveways, parking lots, yards, and streets. Stormwater runoff picks up pollution from the ground and from items that are exposed to the rain during a storm event. During these events, water picks up many of the pollutants that are already on these surfaces, such as metals, pesticides, fertilizers, vehicle oils, dirt, trash, and leaves.

The pollution stormwater carries is a problem because the storm drains in approximately two thirds of the District drain directly to local streams and rivers with little to no treatment through the Municipal Separate Storm Sewer System (MS4). The District of Columbia has two types of sewer systems that collect and transport stormwater and sewage. The MS4 has two separate sets of pipes: one set that carries sewage to the treatment plant and one that carries stormwater to local waterways. The remaining one-third is served by the Combined Sewer System (CSS) that is managed by DC Water and has one set of pipes that collect sewage and stormwater together and transport them to the treatment plant. The CSS can reach capacity during large storm events causing the system to overflow a mixture of sewage and stormwater into local streams and rivers.



Facility activities, such as material handling, outdoor storage, maintenance, industrial processing and other operations can expose potential pollutants to stormwater. If a facility is located within the MS4, it is at risk of allowing pollutants from these activities to wash off the property into storm drains that lead to nearby waterbodies degrading environmental and human health.

The District's Water Pollution Control Act of 1984¹ and the federal Clean Water Act² of 1972 work to protect our waterways from pollution. Under these regulations the discharge (i.e., release) of pollutants to the

¹ See DOEE: Water Pollution Control Act of 1984 at <https://doee.dc.gov/publication/water-pollution-control-act-1984#:~:text=DC%20law%20designed%20to%20regulate,for%20recreation%2C%20and%20for%20industry>

stormwater sewer system is prohibited. Any substance with the potential to alter water quality is considered a pollutant, including: wash water, oils, grease, dirt, litter, and even chemicals in drinking water like chlorine that may be harmful to fish and other living organisms. No amounts of any of these substances may be disposed of or washed into a storm drain. Any accidental releases must be contained and properly disposed of before they can impact the District's waterways. They also need to be carefully tracked and reported. (See Spill Prevention and Response section).

The U.S. Environmental Protection Agency (EPA) developed a permitting system, called the National Pollutant Discharge Elimination System (NPDES), to ensure provisions within the Clean Water Act are being followed. The District has a NPDES permit for the MS4 (the 2018 MS4 Permit), and DC Water has a permit for the CSS. Industrial facilities within the MS4 are also required to obtain a NPDES permit. EPA has simplified the process through a Multi-Sector General Permit (MSGP) for industrial stormwater runoff, to which facilities can apply for coverage.

The District's 2018 MS4 Permit³ outlines how the District will prevent pollution from the MS4 from degrading the water quality of our streams and rivers. This permit identifies types of facilities that are most at risk of contributing pollution to stormwater, called Critical Sources (2018 MS4 Permit, Part 3.4). DOEE's Natural Resources Administration's Inspection and Enforcement Division (IED) manages an inventory of these facilities, which include but is not limited to industrial facilities, automotive activities (maintenance, cleaning, etc.), facilities that use hazardous substances, and facilities with a history of illicit discharges. These facilities are required to have a Stormwater Pollution Prevention Plan (SWPPP) and are inspected regularly.

How to Use This SWPPP:

This SWPPP provides an overview of what a facility is doing to comply with stormwater regulations and to prevent stormwater pollution from entering the District's waterways. It outlines potential sources of stormwater pollution, identifies responsibilities, outlines procedures and their schedules, and describes reporting and recordkeeping requirements. The SWPPP should be regularly updated and revised as the facility and its operations change so that it accurately reflects what is currently being done to prevent stormwater pollution.

A few ways to use this guide:

- 1. Find information and instructions** on how the facility will implement measures to prevent stormwater pollution, called Best Management Practices (BMPs). These include structural BMPs (SBMPs) as well as procedures and schedules called nonstructural BMPs (NSBMPs).
- 2. Learn about the facility** including a description of the property and the activities happening on-site, potential pollutants and their impacts, discharge points and historical records of actions taken to prevent pollution at the site.
- 3. Keep the facility in compliance with stormwater permits.** The measures outlined in this SWPPP are designed to keep this facility in compliance with stormwater permits, and include control measures and inspections, monitoring, and reporting requirements.

² See EPA: Summary of the Clean Water Act at <https://www.epa.gov/laws-regulations/summary-clean-water-act>

³ See EPA: D.C. Municipal Separate Storm Sewer System (MS4) at <https://www.epa.gov/npdes-permits/dc-municipal-separate-storm-sewer-system-ms4>

P2 Database:

The Pollution Prevention Database (P2 Database) was created in 2019 to assist District facilities with staying in compliance with local and federal stormwater regulations. It is an online application in the Salesforce platform and linked to the District's Department of General Services (DGS) Salesforce database, which manages work order requests for the District's Operations and Management (O&M) Plan. Facilities are required to use the P2 Database by the Administrative Order referenced below in the site description section.

The P2 Database's primary function is to provide access to the current version of a facility's SWPPP and the documentation that needs to be filed with it. SWPPP team members are legally required to have access to the most recent copy of the SWPPP (both the District MS4 Permit and MSGP require this). The database also allows employees to easily record necessary documentation and track what has been and needs to be done to comply with stormwater regulations. The P2 Database should be used to track how a SWPPP is being implemented, which means it should be used for data collection with routine and visual inspections, unauthorized non-stormwater discharge evaluations, corrective actions, and spill and leak reports. Employees should update the database with evidence of BMP maintenance, employee training, and record changes to staff and operations at the site. Routine facility inspections, Visual Assessment inspections and Corrective Action Forms require an e-signature, which is provided through the application Conga Sign, to comply with signature requirements.

Access to P2 Database:

1. Go to <https://dcdgs.my.salesforce.com/>
2. Enter your Username and Password provided
3. The system will tell you that you need a verification code. To get this code, email [\[DOEE P2 email address\]](#) with your username and then DOEE will email you back the verification code. Please note to do this during normal business hours. *(HINT: If you click to "remember me" you will not need a verification code with every login)*
4. Once in the database to find your facility please search using the Salesforce Building ID provided. This will bring you to your facility *(HINT: The name of the facility might be different to what you call it, this is how DGS has the facility classified)*

Facility's Salesforce Building ID:	Contacts:
Salesforce Building ID	DOEE P2 Team [email and phone number] Salesforce Support: [email]

SECTION 1: SITE DESCRIPTION AND CONTACT INFORMATION

General Facility Information:	
Name of Facility:	
Facility Address:	
Salesforce Building ID:	
Longitude/Latitude:	
Facility size (in acres):	
Sewer System:	
Permit Type:	
NPDES Tracking Number:	
Sector(s):	"Activity sector"
Facility Contact Information:	
Facility Operator:	Name: Email: Phone:
Facility Owner:	Name: Email: Phone:
Facility Manager:	Name: Email: Phone:

Stormwater Pollution Prevention Team: The Stormwater Pollution Prevention Team (SWPPT) is responsible for overseeing the development of the SWPPP, implementing, and maintaining control measures, and taking corrective actions when required. If there are additional members or roles besides those listed below, it will be found in the attachments.

All SWPPT members must have ready access to either an electronic or paper copy of the current version of the SWPPP and other relevant documents and information that are required to be kept with the SWPPP. The P2 Database was designed to provide this access to the SWPPP and supporting material.

Facility Manager Roles:

- Reports and records any spills, leaks, and unpermitted or unusual discharges
- Responsible for reporting non-emergency spills and leaks to DOEE
- Ensures that when corrective actions are identified they are completed and properly documented in the SWPPP
- Updates and edits the SWPPP as needed
- Ensures any in-house maintenance is documented and documentation uploaded into the P2

Database

- Provides input and oversight over any operational changes needed to address corrective actions

SWPPP Team Lead Roles:

- Ensures implementation of SWPPP
- Spill Response Coordinator
- Alerts team members to any problems, changes, small spills, drips, or leaks, and addresses needed remediation
- Provides training on the SWPPP to other team members and new employees
- Conducts or manages quarterly sampling and completes corrective action form if evidence of pollution is present
- Conducts or manages analytical monitoring (if needed) and completes corrective action form if evidence of pollution is present and implements Additional Implementation Measures (AIM) when required
- Performs routine self-inspections and completes corrective action form if evidence of pollution is present
- Oversees purchasing and organizing the delivery of services and resources needed to implement the SWPPP, such as ordering spill kit supplies, storage containers, and structural BMP maintenance.
- Reports and records any spills, leaks, and unpermitted or unusual discharges
- Updates and edits the SWPPP as needed

SWPPP Team Member Roles:

- Alerts team members to any problems, changes, small spills, drips, or leaks, and addresses needed remediation
- Conducts or manages quarterly sampling and completes corrective action form if evidence of pollution is present
- Performs routine self-inspections and completes corrective action form if evidence of pollution is present
- Reports and records any spills, leaks, and unpermitted or unusual discharges
- Updates and edits the SWPPP as needed

Facility Manager:	Name: Email: Phone:
SWPPP Team Lead:	Name: Email: Phone:
SWPPP Team Member 1:	Name: Email: Phone:
SWPPP Team Member 2:	Name: Email: Phone:
SWPPP Team Member 3:	Name: Email: Phone:

SWPPP Team Member 4:	Name: Email: Phone:
-------------------------	---------------------------

Site Activities:					
Activity Sector:	Subsector:	Is the activity industrial?	SIC Codes and Activity:	Site Activities:	Primary Activity?

If Activity Sector is "Critical Source" add:

The activities on this facility are not considered industrial; therefore, this facility does not need an MSGP permit. Non-industrial facilities that drain to the MS4 area of the District are covered by a District-wide permit managed by the Department of Energy and Environment (DOEE), called the District MS4 Permit.

All Facilities:

This facility is a part of the 2018 Corrected Administrative Order on Consent, U.S. Environmental Protection Agency Region III Docket No. CWA-03-2018- 0019DN ⁴, and therefore a part of the District’s Stormwater Pollution Prevention Programs Plan for District Operations (O&M Plan). This facility has been identified as a Critical Source facility due to its location in the MS4 and facility operations being potential sources of pollution. This SWPPP and the BMPs outlined here within will ensure compliance with the administrative order.

Discharge Waters Information: Discharge waters are the waterways to which stormwater from a facility ultimately drains. This information is used by emergency response professionals to respond to spills originating from the facility and informs activities at the facility that may impact the waterway’s water quality. The watershed is all the area surrounding the waterway that drains to it, and a sub-watershed is a subsection of the larger watershed, such as the area that drains to a tributary that leads to the discharge waters. Stormwater from Facility Name drains into the waterways outlined in the table below.			
Area Name:	Area Description:	Watershed:	Sub-watershed:

Impaired Waters: A waterway can be found to be impaired for stormwater pollution if it fails to meet accepted water quality standards that are based on toxicity and environmental impact. Impaired waterways

⁴ See EPA: Scanned Document at [https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/55C6268DAD46B262852582BB001BCF5B/\\$File/Govt%20of%20District%20of%20Columbia.CWA.CorrectedAOC.6.28.2018.pdf](https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/55C6268DAD46B262852582BB001BCF5B/$File/Govt%20of%20District%20of%20Columbia.CWA.CorrectedAOC.6.28.2018.pdf)

are carefully regulated and given Total Maximum Daily Loads (TMDLs), which limit the daily amount of a pollutant permitted to be in the waterway. This facility's discharge waters have been found to be impaired for the pollutants outlined in the table below, so extra care should be taken to prevent these pollutants from leaving the site.

Impaired Waters:

Pollutants Causing Impairment:

TMDLs for Pollutants:

(MSGP) Water-Quality Based Effluent Limitations: Effluent Guidelines are national wastewater discharge standards that are developed by EPA on an industry-by-industry basis. These are technology-based regulations and are intended to represent the greatest pollutant reductions that are economically achievable for an industry. The MSGP Permit identifies the stormwater discharges subject to effluent limitation guidelines that are authorized for coverage under this permit (2021 MSGP Part 2.2).

Effluent limitations:

Effluent limitation guidelines that apply to stormwater discharges:

Facility Site Description:

Description:

Description

General Physical Characteristics on Site:

Gen. Physical Characteristics on Site

General Description of the Activities:

General Description of the activities

Describe the boundary between MS4 and CSS:

Facility Size (acres):

District Agencies that Operate Onsite: District Agencies Operate Onsite

Outfalls: An outfall is the point where stormwater associated with activity discharges to waters of the District or a municipal separate storm sewer system (MS4). An outfall does not include conveyances, pipes, or tunnels that carry stormwater runoff within a site, but is the point at which they leave the site. If the site's stormwater goes directly into a stream, river or other water body, the point at which the runoff from the facility enters the receiving waterbody is considered the outfall. Sometimes the actual receiving waterbody may be some distance away from the site (e.g. when a facility's stormwater flows to the MS4, which then discharges to a stream or river miles away). In such cases, the facility's outfall is

considered the location at which stormwater leaves the site. The table below outlines the outfalls at this site.

Outfall Name:	Outfall Location:	Outfall Description:	Area Outfall collects water from:

Maps

General Location Map:

A general location map can be found in the attachments.

Site Map:

A site map for this facility can be found in the attachments.

SECTION 2: SUMMARY OF POTENTIAL POLLUTANT SOURCES:

Potential Pollutants- The following materials or activities exposed to stormwater or from authorized stormwater discharges at the site are described in the table below. Include all the potential pollutants that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the last three years prior to the date of this SWPPP (**MSGP** facilities should refer to 2021 MSGP 6.2.3.1). These include:

1. Machinery and equipment;
2. Materials;
3. Material handling activities;
4. Industrial production and/or processes;
5. Structures (e.g. metal structures that can leach aluminum or copper because of acid rain); and
6. Waste.

Pollutant Source:	Potential Pollutants:	Areas found:

Potential Spills and Leaks - The table below is a description of where potential spills and leaks could occur on site that could contribute pollutants to stormwater discharge, and specifies which outfall(s) are likely to be affected by such spills and leaks.

Location Where Spills and Leaks Could Occur:	Point(s) of Discharge that Could Be Affected:
Pull from Spills and Leak report> Event type- Potential Spills and Leaks> Potential Spill/Leak Locations	Pull from Spills and Leak report> Event type- Potential Spills and Leaks> Discharging Points

Past Spills and Leaks - The table below is a description of significant spills and leaks in the past three years of oil or toxic or hazardous substances that actually occurred at exposed areas, or that drained to a stormwater conveyance.

Date:	Description:	Point(s) of Discharge affected:
Pull from Spills and Leak report> Event type- Past Spill and Leak> Date and Time Inspection Started	Pull from Spills and Leak report> Event type- Past Spill and Leak> Material Type Pull from Spills and Leak report> Event type- Past Spill and Leak> Amount or Quantity of Material	Pull from Spills and Leak report> Event type- Past Spill and Leak> Discharging Points

Authorized Non-Stormwater Discharges:

The District MS4 Permit and the MSGP allow some non-stormwater discharges to the MS4 or directly to waterways only when the following three conditions have been met:⁵

1. Appropriate stormwater activities and controls have been applied;
2. Discharges are managed so that water quality is not further impaired; and
3. The requirements of the federal CWA and EPA regulations are met.

Allowable discharges include but are not limited to:

- a. Irrigation/landscape drainage;
- b. Uncontaminated ground water;
- c. Foundation or footing drains where water is not contaminated;
- d. Potable water, including dechlorinated water line flushing;
- e. Uncontaminated air conditioning or refrigeration condensate;
- f. Pavement wash water, provided that detergents and hazardous cleaning products are not used, that the wash waters do not come into contact with oil/grease deposits or sources of pollutants, and that you have implemented appropriate control measures to minimize discharges of mobilized solids and other pollutants;
- g. External building/structure washdown, including power washing, that does not use detergents or hazardous cleaning products, and provided you have implemented appropriate control measures to minimize discharge of mobilized solids and other pollutants;
- h. Fire hydrant flushing; and
- i. Emergency firefighting activities.

(MSGP) Unauthorized Non-Stormwater Discharges Documentation:

The facility inspected and documented all discharge points for unauthorized non-stormwater discharges.

Documentation of the evaluation includes:

1. The date of the evaluation;
2. A description of the evaluation criteria used;
3. A list of the discharge points or onsite drainage points that were directly observed during the evaluation; and
4. If there are any unauthorized non-stormwater discharges found, explanation of action that was

⁵ District 2018 MS4 Permit Part 1, Section 3, “Authorized Discharges,” and 2021 MSGP Part 1, Section 2.2, “Authorized Non-Stormwater Discharges.”

immediately taken, such as implementing control measures, to eliminate those discharges or seek an individual NPDES wastewater permit and document that you obtained the permit (for example, a floor drain was sealed, a sink drain was re-routed to sanitary, or an NPDES permit application was submitted for an unauthorized cooling water discharge).

The facility has conducted an evaluation to determine the presence of non-stormwater discharges on site and assessed the discharges for the presence of pollution.

Record Type/Unauthorized Non-Stormwater Discharge Inspection- Inspection Name

Facility Name:

Date/Time Inspection Started:

Inspector Name:

Outfall/discharge point evaluated:

Any unauthorized non-stormwater discharges:

Description of Evaluation Criteria: Acceptable test or evaluation techniques include, but are not limited to, dye testing, television surveillance, visual observation of discharge points or other appropriate locations during dry weather, water balance calculations, and analysis of piping and drainage schematics

Actions Taken to eliminate unauthorized discharges:

Notes:

Salt Storage or Piles Containing Salt

Salt Storage Type:

Salt Storage Location:

(MSGP) Sampling Data Summary: Existing dischargers need to provide a summary of all stormwater discharge sampling data collected at the facility during the previous permit term.

Pulled from "Benchmark/Effluent Results" since 2015

If there is no sampling data available: There are no previous stormwater discharge sampling data available for this facility.

If there is sampling data available use table below: See table below for a summary of sampling data. Additional details are to be found in the attachments.

Sample Date:	Record Type:	Exceedance(s) detected:	Notes:
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Pull from Date Sample			
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SECTION 3: STORMWATER CONTROL MEASURES

Selection and Design of Control Measures: Control measures are processes, procedures, and structures put in place to prevent stormwater pollution. This section of the SWPPP outlines which control measures Facility Name is using. These control measures should be revised if existing control measures are not enough to prevent stormwater pollution. (MSGP facilities should refer to 2021 MSGP Part 2.1.1).

Concepts the facility considers when choosing control measures:

1. It is much easier to prevent stormwater from coming into contact with polluting materials than removing pollution from stormwater. This can be done by storing things inside, managing run-on with curbs and swales, and elevating materials to prevent contact with stormwater at ground level;
2. To uses a combination of control measures to be more effective than when used on their own. Control measures can be linked together creating a “treatment train” that incrementally removes stormwater pollution as runoff passes through each measure.
3. Chooses controls that are designed to handle the type and quantity of the pollution the facility is trying to prevent.
4. Minimizes impervious areas and maximize infiltration (when stormwater soaks into the ground) to reduce the frequency and volume of stormwater discharges and improve groundwater recharge, but be careful to avoid ground water contamination.
5. To reduce flow using open vegetated swales and natural depressions to reduce in-stream impacts of strong, erosive flows.
6. To use structural BMPs that filter stormwater (e.g., swirl separators and sand filters) may be appropriate in some instances to minimize the discharge of pollutants.
7. Have a plan in place to minimize impacts from major storm events, including extreme/heavy precipitation, storm surge, hurricanes, and flood events.

Nonstructural BMPs: Facilities must select, design, install, and implement stormwater control measures (including best management practices) to minimize pollutant discharges. These control measures are both Structural BMPs (outlined in “Structural BMPs and Sewer Inlets”) and Nonstructural BMPs.

This facility implements the following nonstructural BMPs below to prevent stormwater pollution. The control measures address the potential pollutant sources outlined by minimizing pollutant exposure to stormwater, implementing good housekeeping procedures, maintaining control measures, preventing and responding to spills, controlling sediment and erosion, managing runoff, preventing the tracking of pollutants, and ensuring employees are trained on how to implement these measures.

(MSGP) Nonstructural BMPs with a “*” in the BMP Description were selected to comply with the MSGP’s Non-numeric technology-based effluent limits and “**” for Water quality-based effluent limits.

Nonstructural BMP’s: Site Activity	BMP Description:	Schedule:
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Structural BMPs and Sewer Inlets: These are structures that divert, drain, or filter stormwater runoff. These include berms, storm drains, bioretentions, swales, dry or wet ponds, oil/water separators, cisterns, and filtration. These structures need to be inspected and maintained to ensure functionality.

The definitions of the Structural BMPs and their sub types are based off the DOEE Stormwater Management Guidebook⁶. If a BMP has an approved DOEE stormwater management plan (SWMP), the facility must comply with the orders and directions to achieve compliance with the approved SWMP⁷.

(MSGP) These SBMP's have been selected to reduce the frequency and volume of discharges and minimize the discharge of pollutants to comply with the MSGP's Non-numeric technology-based effluent limits and Water quality-based effluent limits.

BMP Name:	Maintenance Frequency:	Inspection Frequency:	BMPs & Inlets	Sub-BMPs and Sub-Inlets	BMP or Inlet Sub-Type	DOEE approved SWMP No:

Training: The facility will annually train all employees, contractors, sub-contractors, and agents who work in areas where materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to comply with this permit (e.g., inspectors, maintenance personnel), **including all members of your stormwater pollution prevention team**. Training must ensure the following personnel understand the requirements of the MS4 Permit and MSGP (if applicable) and their specific responsibilities with respect to those requirements:

- i. Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- ii. Personnel responsible for the storage and handling of chemicals and materials that could become pollutants discharged via stormwater;
- iii. Personnel who are responsible for conducting and documenting monitoring and inspections; and
- iv. Personnel who are responsible for taking and documenting corrective actions.

New SWPPT members will receive training within the first 90 days of being added to the team so they have the prerequisite knowledge with which to conduct SWPPT activities.

Trainings help prevent Potential Pollutants listed in Section 2 from contributing to stormwater pollution in the following ways:

1. Employees know how to prevent, clean up, and report spills and leaks
2. Materials left outdoors are stored properly, in a way that prevents contact of potential pollutants with stormwater and minimizes the risk of spills, leaks, and tracking

⁶ See DOEE: Stormwater Management Guidebook at <https://octo.quickbase.com/up/bjezqk3qc/a/r259/e6/v0>

⁷ Full 21 DCMR Chapter 5 with Changes Accepted - 2020 Amendments. Part 516, Section 3

3. Materials are handled responsibly, in a way that minimizes spills and prevents tracking and blowing of the material
4. SBMPs are properly maintained so they effectively manage and, if applicable, treat stormwater
5. Areas prone to erosion are addressed to prevent sediment from leaving the site

Note: See the 2018 District MS4 Permit part 3.9 and the 2021 MSGP sections 2.1.2 and 8 for a full list of training requirements.

Personnel must be trained in at least the following if related to the scope of their job duties:

- i. Importance of protecting water quality and impacts of stormwater pollution, and sources of runoff and pollution
- ii. The requirements of the MS4 Permit and the MSGP, if relevant
- iii. An overview of what is in the SWPPP
- iv. The selection, design, operation, and maintenance standards for control measures
- v. Ways that job activities are to be performed in order to prevent or minimize impacts to receiving waters including spill response procedures, good housekeeping, maintenance requirements, and material management practices
- vi. The location of all the controls required by the MS4 and/or MSGP permit, and how they are to be maintained
- vii. The proper procedures to follow with respect to the permit’s pollution prevention requirements
- viii. When and how to conduct inspections, record applicable findings, and take corrective actions
- ix. Transportation-specific control measures including used oil and spent solvent management, fueling procedures, general good housekeeping practices, proper painting procedures, and used battery management
- x. Additional training requirements associated with industrial activity (see 2021 MSGP Part 8) and
- xi. The facility’s emergency procedures for severe storm events.

Training Logs for this facility are updated and maintained in the P2 Database. DOEE’s P2 Team, updates these records on a quarterly basis. If a SWPPP team member receives training that was not provided by DOEE, please submit evidence of attendance, such as a confirmation email or sign-in sheet, the training’s agenda, and event details to DOEE at [email address].

SECTION 4: SCHEDULES AND PROCEDURES

The following procedures are conducted at a frequency defined by the table below. Failure to do so could be considered a violation of the District’s MS4 Permit and MSGP (if applicable).

For this SWPPP, quarters are defined by the calendar year:

- Quarter 1: January 1 – March 31
- Quarter 2: April 1 – June 30
- Quarter 3: July 1 – September 30
- Quarter 4: October 1 – December 31

If a procedure is not completed according to its required schedule, it will be done as soon as possible and the reason why it was missed will be documented in the P2 Database.

Reporting Requirements:		
<u>Procedure</u>	<u>Schedule</u>	<u>Associated Records</u>
Routine facility inspections	<p><i>Routine Inspection Performed</i></p> <p>At least one inspection each year will be during a time when stormwater is leaving the site (i.e. during a rain event)</p> <p>DUE BY: End of Quarter</p>	<p>Routine Inspection Form</p> <p>Reports are kept with SWPPP in the P2 Database</p>
Annual Stormwater Training for employees	Annually	Training log in the P2 Database
Corrective Actions	<ul style="list-style-type: none"> • Within 24 hours of becoming aware of the issue document existence of corrective action • Within 14 days from the time of discovery document corrective actions taken or that will be taken 	<p>Corrective Action Form and/or Spill and Leak Form</p> <p>Reports are kept with SWPPP in the P2 Database</p>
<p>Noncompliance endangering health or the environment.</p> <p>If facility discharges into the MS4, facility must report noncompliance to DOEE. If MSGP, facility must also submit a report to EPA Region 3.</p>	<ul style="list-style-type: none"> • Within 24-hours from discovery of the issue provide an oral report to EPA and DOEE • Within 5 days provide a written report with additional details about the incident 	<p>DOEE and, if MSGP, EPA Region 3 phone call, followed up by email</p> <p>The written report must contain a description, time frame, and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.</p> <p>This report will be sent to DOEE's Inspection and Enforcement Division: David Pilat, o.(202) 281-3963, c. 202) 805-1355, david.pilat@dc.gov , or Ibrahim Famuditimi: o.(202) 535-2643, c.(.202) 439-5698, ibrahim.famuditimi@dc.gov</p>
Procedural and administrative changes to the SWPPP (e.g., name changes, changes in the description of potential pollution sources, modifications to a BMP)	<ul style="list-style-type: none"> • Annual SWPPP Review • Update throughout the year as changes occur • Within 14 calendar days to address events that trigger corrective actions, if needed 	<p>SWPPP Modification Log in the P2 Database.</p> <p>Updated SWPPP that has been certified (signed and dated).</p>

	<ul style="list-style-type: none"> (MSGP Only) Within 45 days after conducting the final routine facility inspection of the year update copy of publicly accessible SWPPP 	
Reportable quantity spills	Immediately- as soon as you have knowledge of a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or more than a reportable quantity	DOEE and if MSGP, EPA Region 3
Anticipated Non-Compliance	Advanced notice: any changes in the facility or activity that you anticipate will result in non-compliance	DOEE and if MSGP, EPA Region 3
SBMP and Inlet Maintenance	<ul style="list-style-type: none"> Varies by SBMP and Inlet Right after a spill gets into the SBMP or inlet <p>As soon as possible upload receipts, photos, and other evidence of BMP maintenance into the P2 Database (e.g. within one month of receipt)</p>	Update SBMP record with maintenance date and upload evidence of maintenance into the P2 Database
(MSGP) MSGP Requirements		
Quarterly visual assessment	Once a quarter. At least one will be snow melt if possible DUE BY: End of Quarter	Quarterly Visual Assessment Form Reports are kept with SWPPP in the P2 Database
Analytical monitoring	See Analytical Monitoring Section DUE BY: Within 30 days of receiving full laboratory results for all monitored discharge points during the reporting period.	Analytical Monitoring report and associated documentation in P2 Database and Net-DMR
Annual report	Annually DUE BY: January 30 for each year of permit coverage	Annual Report Form requires facility to use the NPDES eReporting Tool NeT-MSGP
An operator needing to correct or update any NOI fields	Within 30 calendar days after the change occurs	Submit Change NOI in NeT-MSGP
AIM Documentation	<ul style="list-style-type: none"> Within 24 hours of becoming aware of the issue document existence of AIM condition Within 14 days from the time of discover document AIMs taken or that will be taken and update 	Reports are kept with SWPPP in the P2 Database

	SWPPP, if necessary	
Exceedance Report for Numeric Effluent Limitations	30 days after receiving laboratory results if 30-day follow-up monitoring indicates exceedance	Net-DMR
Planned Changes	No fewer than 30 days prior to any planned physical alterations or changes to operations that could increase/alter sources and quantities of pollutants	EPA Region 3
Public Sign of Permit Coverage	Continuous – The facility will post a sign and maintain it so that it is accurate and readable from the public right of way. Additional requirements are in 2021 MSGP Part 1.3.5	SWPPP Modification Log in the P2 Database or an attachment to the SWPPP

Spill Prevention and Response:

Spill Prevention: Avoiding spills and leaks is preferable to cleaning them up afterward, not only from an environmental standpoint, but also because spills cause increased operating cost and lower productivity. Spill prevention measures include:

1. Proper storage practices for oil products and hazardous materials;
2. Routine inspections of potential pollutant sources that could spill or leak;
3. Regular inspections and maintenance of spill response kits and spill containment devices; and
4. Routine maintenance of equipment containing oil or hazardous materials.

Spill and Leak Response: Utilize dry cleanup methods for responding to spills and leaks. Procedures for cleaning up spills and leaks involve utilizing the spill kits that are located at the site and are outlined below.



Spill kits are important tools for responding to spills and leaks. They will be clearly labeled, in their designated location (in the Location of Spill Kits below), and easily accessible. This allows facility staff to quickly and easily respond to spills. Material and equipment are not allowed to be stored in front of spill kits so that it blocks access.

Location of Spill Kits: [Enter Locations]

Contents of Spill Kits: Spill kits are inspected quarterly and restocked as needed. The following materials are found in the spill kits: protective gear, berms, plastic sheeting, absorbent pads, loose absorbents, and a spill response guide. Ensure the kit is stocked with absorbents that can absorb the materials on-site that could spill. For instance, some absorbents only absorb oil and some are specially formulated to neutralize and absorb caustic materials and acids.

Spill/Leak Contacts:

1. *Spill/Leak Response Supplies:* Contact this person for supplies to respond to spills, such as restocking spill kits or purchasing additional drip pans or tarps.

Name: SWPPP Lead contact name

Email: SWPPP Lead contact email

Phone: SWPPP Lead contact phone

2. **Facility Manager:* Contact this person if there is a spill or leak, or if a vehicle, equipment, or control measure needs maintenance.

Name: Facility Manager contact name

Email: Facility Manager contact email

Phone: Facility Manager phone

3. *Department of Energy and Environment:* Verbally notify DOEE within 24 hours of a release and provide a written release report within 5 days of the event.

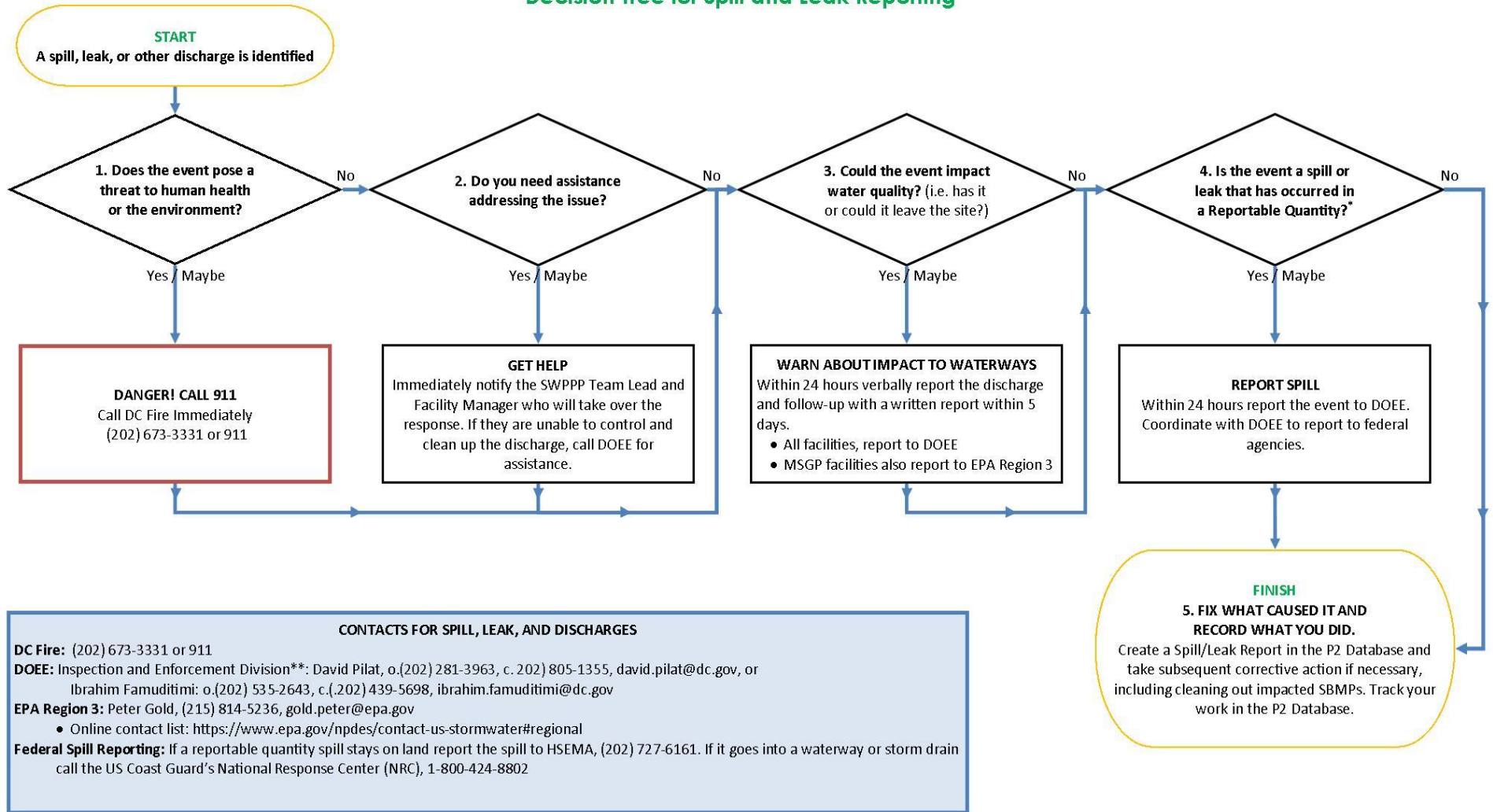
Inspection and Enforcement Division: David Pilat, o.(202) 281-3963, c. 202) 805-1355, david.pilat@dc.gov, or Ibrahim Famuditimi: o.(202) 535-2643, c.(202) 439-5698, ibrahim.famuditimi@dc.gov

3.2.1. Spill and leak response procedures:

Use the flow chart below when a spill or leak is detected for instructions on how to respond.

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Decision Tree for Spill and Leak Reporting



*A leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a **reportable quantity** established under either [40 CFR Part 110](#) (oil), [40 CFR Part 117](#) (hazmat), or [40 CFR Part 302](#) (hazmat).

** The Chief of DOEE's Inspection and Enforcement Division has delegated authority to David Pilat and Ibrahim Famuditiimi for spill and leak reporting

DETAILED STEPS FOR RESPONDING TO SPILLS, LEAKS, & OTHER DISCHARGE EVENTS

Step 1. Does the event pose a threat to human health or the environment? These include spills, leaks, and other discharges that allow raw sewage, hazardous materials (e.g. toxic, flammable, explosive, etc.), and other toxic materials to be released, or an event that gets into a public right of way making it unsafe (e.g. slippery or impassable).

YES or Unsure. Call 911 immediately. Responders can help you identify if it is a threat to human health or the environment. Once a response has been activated, skip to Step 4 to determine whether or not DOEE and federal agencies need to be notified as well. MSGP facilities must also notify EPA Region 3 within 24 hours by calling Peter Gold at 215-814-5236, and then follow up with a written report after five calendar days. (Gold.Peter@epa.gov).

NO. Continue to Step 2.

Step 2. Can you contain and clean up the event on your own?

YES. Protect storm drains using absorbent socks, booms, or plastic sheeting to prevent material from getting into the inlets. Then use dry cleanup methods to clean up the event. Begin the corrective action process by taking immediate action and recording the issue in the P2 Database. Continue to Step 3.

NO. Reach out to the Facility Manager or the SWPPT Leader for assistance. Events that cannot be contained or cleaned up by staff may require a call to DOEE for assistance. Begin the corrective action process by taking immediate action and recording the issue in the P2 Database. Then continue to Step 3.

Step 3. Could the event impact water quality in local streams and rivers? If material from the events has gotten into a storm drain and left the site or is anticipated to leave the site, it needs to be reported. This step is similar to Step 1, but the pollution from these events is not immediately dangerous to human health or the environment.

YES or Unsure. Notify DOEE verbally within 24-hours by calling Joshua Rodriguez at 202-535-2226 and then follow up with a written report within five calendar days. DOEE can help you determine if the event could impact water quality if you are unsure. Then continue to Step 4.

MSGP facilities must also notify EPA region 3 within 24 hours by calling Peter Gold at 215-814-5236, and then follow up with a written report after five calendar days at gold.peter@epa.gov.

NO. All pollution can be contained and cleaned up and effected structural BMPs/control measures (SBMPs) and inlets can be cleaned out before pollution leaves the site. Continue to Step 4.

Step 4. Is the amount of material spilled, leaked, or discharged in a quantity that is legally required to be reported to local and federal authorities? You must report any leak, spill, or other releases containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity even if it does not leave the site and even if you are able to clean it up on your own. Reportable quantities are established under 40 CFR Part 110 (oil), 40 CFR Part 117 (hazmat), and 40 CFR Part 302 (hazmat), and includes the total amount spilled, leaked or discharged during a 24-hour period.

YES or Unsure. Within 24 hours report the event to DOEE David Pilat, o.(202) 281-3963, c. 202) 805-1355, david.pilat@dc.gov, or Ibrahim Famuditimi: o.(202) 535-2643, c.(202) 439-5698, ibrahim.famuditimi@dc.gov

DOEE can help you identify whether or not the event needs to be reported and can help you navigate reporting to the appropriate federal agency. Then take subsequent corrective action to prevent the issue from happening again. Record corrective actions in the P2 Database. Continue to Step 5 as part of these efforts.

NO. Take subsequent corrective action to prevent the issue from happening again and record your efforts to take corrective action in the P2 Database. Continue to Step 5 as part of these efforts.

Step 5. Did the spill, leak, or other discharge get into a storm drain or inlet? If material from the event got into storm drains, inlets, and SBMPs but did not leave the site, these structures need to be inspected and cleaned out, if necessary, as soon as possible and before the next storm event. Maintenance will preserve the capacity and functionality of SBMPs for future rain and spill events and will remove the material from the system before runoff can wash it offsite. See Step 3 for what to do when the material got into a storm drain, inlet, or SBMP and left the site.

YES or Unsure. Inspect the storm drains, inlets, and any SBMPs that could be impacted by the event as soon as possible and again after the first rain storm or snow melt after the event. Have the drains, inlets and SBMPs maintained if they were impacted (i.e. material from the event is in them).

NO. No additional action is necessary so long as subsequent corrective action is taken to prevent the spill, leak, or other discharge from happening again.

The Dry Cleanup Method: The following procedures are used to respond to and clean up small spills and leaks without using water.

Step 1: Contain the spill or leak. This can be done using a berm found in the spill kit or using plastic sheeting to cover any storm drains to which the spill or leak is traveling. This prevents the material from entering the storm drain.

Step 2: Stop the source of the spill or leak. Identify where the spill or leak is coming from and take necessary measures to stop it. If a leaky vehicle or equipment cannot be repaired promptly, place a drip pan, absorbent pads, or loose absorbent under the leak until it can be serviced.

Step 3: Clean up. Clean up the spill or leak using contents of the spill kits. Absorbent pads can be used to wipe up spills and loose absorbents can be sprinkled over the spill or leak. The loose absorbent can be worked into the liquid using a non-sparking shovel or broom.

- **Notify SWPPP Team Lead Name if supplies in the spill response kit are running low**

Step 4: Dispose of used absorbents. Sweep up the used loose absorbents within 24 hours or before the next rain event using a non-spark shovel, broom, and/or dustpan. All absorbent materials (loose or pads) should be disposed of properly and in accordance with any hazardous waste regulations that apply.

Step 5: Record the spill or leak in the Facility SWPPP by notifying the facility manager or appropriate SWPPT representative, or by entering the information in the P2 Database using the "Spill and Leak Report."

- Note: if the spill or leak is in a reportable quantity additional reporting will be required (see Reporting Requirements table)

Information needed when a spill/leak cannot be contained

If a spill or leak cannot be contained with the staff on site, be prepared to report the following information:

- **Contact and Facility Information:**
 - Your name, location, organization, and telephone number
 - Name and address of the party responsible for the incident; or name of the carrier or vessel, the railcar/truck number, or other identifying information
- **Incident Information:**

- Location of the incident
- Date and time of the incident
- Source and cause of the release or spill
- Medium (e.g., land, water) affected by release or spill
- Danger or threat posed by the release or spill
- Number and types of injuries or fatalities (if any)
- **Spill Material Information:** Types and quantity of material(s) released or spilled
- **Other Information:**
 - Weather conditions at the incident location
 - Whether an evacuation has occurred
 - Other agencies notified or about to be notified
 - Any other information that may help emergency personnel respond to the incident

How to report other types of discharges

If the following circumstances are discovered, contact the following:

1. *Pollution or questionable discharges originating off-site are observed running into storm drains*

- DOEE: Inspection and Enforcement Division: David Pilat, o.(202) 281-3963, c. 202) 805-1355, david.pilat@dc.gov, or Ibrahim Famuditimi: o.(202) 535-2643, c.(.202) 439-5698, ibrahim.famuditimi@dc.gov
- DC Water (CSS Areas) – (202) 612-3400
- Find out if the location is in MS4 or CSS by looking it up on DOEE’s Watershed Finder: <http://geospatial.dcgis.dc.gov/watershedfinder>

2. *Leaking sewer line or water main:* DC Water – (202) 612-3400

3. *Illegal dumping of solid waste:* call 311, visit 311.dc.gov, or use the DC 311 smartphone app.

Inspections:

Routine Facility Inspections:

Inspections are conducted during normal facility operating hours. Inspections occur in areas where materials or activities are exposed to stormwater, areas that have potential pollutant sources, areas where previous spills and leaks have occurred, and locations of SBMPs on site.

- **At least one member of the SWPPP team will be present during a Routine Facility Inspection. (MSGP)** This is a regulatory requirement for this facility.
- **All areas at the facility will be inspected for a Routine Facility Inspection to be considered complete.**
- **(MSGP) At least one Routine Facility Inspection each year will be done during a time when stormwater is leaving the site,** such as when it is raining or when snow melt is leaving the site. This is a regulatory requirement for this facility.

These inspections are conducted using the “Routine Inspection” form in the P2 Database. The P2 Database will generate and send the inspection report for review and e-signature. Whenever the Routine Inspection shows evidence of corrective action needed, the procedures are initiated as outlined in the Corrective Actions Section.

Frequency: Routine Facility Inspections are conducted *Routine Inspection Performed.*

- The facility will conduct routine inspections at this frequency to ensure to avoid a permit violations for both the District MS4 Permit **(MSGP)** and the MSGP.
- If a routine inspection is missed, it will be completed as soon as possible, even if it means conducting two inspections during the next interval, and the reason for missing it will be documented in the “Actions Needed / Actions Taken / Notes” section of the Routine Inspection Form in the P2 Database.
- If “daily” or “weekly” walkthroughs occur with facility personnel, documentation of these efforts will not be included in the P2 Database under the routine facility inspection report. The facility does not consider these walkthroughs as a substitute for full routine facility inspections, which are more comprehensive.

(MSGP) Quarterly Visual Assessment of Stormwater Discharges:

Once each quarter for the entire MSGP permit term, a stormwater sample from each outfall is collected and a visual assessment of each of these samples is then conducted. Due to the District being an area subject to snow, **at least one quarterly visual assessment must capture snowmelt discharge** (see 2021 MSGP Part 3.2 for full requirements). This visual assessment is conducted:

1. Within the first 30 minutes of an actual discharge from a storm event. If a sample cannot be taken in the first 30 minutes, it is collected as soon as practicable after the first 30 minutes and the reason why it was not possible is documented. Snowmelt samples are taken during a period with a measurable discharge from site.
2. In a clean, colorless glass or plastic container and is examined in a well-lit area.
3. After storm events, or discharges that occur at least 72 hours (three days) from the previous discharge. The 72-hour (three-day) storm interval does not apply if facility documents that less than a 72-hour (three-day) interval is representative for local storm events during the sampling period.
4. Using the “Quarterly Visual Assessment Inspection” form found in the P2 Database.

The following water quality characteristics are examined in each sample:

Color	Settled solids
Odor	Suspended solids
Clarity	Foam
Floating solids	Oil sheen
Any obvious indicators of stormwater pollution	

The P2 Database will generate and send the inspection report for review and e-signature, which is how completed Quarterly Visual Assessments of Stormwater Discharges are certified.

Corrective Action: Whenever the visual assessment shows evidence of stormwater pollution, corrective action procedures are automatically initiated as outlined in the Corrective Actions Section. Evidence of pollution will not be ignored. If any is found, the drainage area leading to the outfall with evidence of pollution will be inspected to identify the causes of pollution and control measures will be evaluated to prevent recurrence of the issue.

These samples are not required to be collected consistent with 40 CFR Part 136 procedures but will be collected in such a manner that the samples are representative of the stormwater discharge. Additional guidance on monitoring can be found at: <https://www.epa.gov/npdes/industrial-stormwater-guidance>

If this facility uses an exception for Substantially Identical Discharge Points (SIDP) this information will be in the attachments.

(MSGP) Analytical Monitoring:

This facility will collect and analyze stormwater samples and document monitoring activities for the MSGP. The table below outlines what the facility is responsible for monitoring. See 2021 MSGP Part 4 for additional details. This monitoring will be conducted by a contractor according to test procedures approved under 40 CFR Part 136. For each monitoring event, the contractor performing the monitoring will gather storm event data and will be included in the report. Any numeric control values applicable to stormwater discharges will be found in the attachments.

Locations where samples are collected are indicated in the facility site map in the attachments. If this facility uses an exception for Substantially Identical Discharge Points (SIDP), this information will also be in the attachments.

Analytical Monitoring will be uploaded into the NetDMR (Network Discharge Monitoring Report) Support Portal: <https://cdxnodengn.epa.gov/net-netdmr/>

Note:

- State-specific monitoring: The District does not have any additional monitoring requirements currently.
- EPA will notify the facility of any impaired waters, Special Waters of the US, and other monitoring any time after submission of the NOI. If this happens the following table will be updated to reflect the changes.

Monitoring Type:	Monitoring Type Applies To:	Frequency:	Duration:	Parameters Monitored:

(MSGP) Annual Report:

The facility will submit an Annual Report to EPA by January 30th for each year of the permit coverage containing information generated from the past calendar year. The report will be submitted entering data in the EPA's electronic NPDES eReporting tool for the MSGP (NeT-MSGP). To access NeT-MSGP, go to <https://www.epa.gov/compliance/npdes-ereporting>. The report will include the following information:

- A summary of the past year's routine facility inspection documentation
- A summary of the past year's quarterly visual assessment documentation
- Any four-sample (minimum) average benchmark monitoring exceedance
- A summary of the past year's corrective actions and AIM triggering events
- Any incidents of noncompliance in the past year or currently ongoing, or if none, a statement that facility is in compliance with the permit.

Corrective Actions:

When a current or potential discharge of stormwater pollution is identified, action is immediately taken to remedy the problem. This is called taking corrective action because it fixes the issue and prevents it from recurring so that the facility is back on track with meeting stormwater pollution prevention requirements. In the P2 Database a corrective action can be triggered by a Routine Inspection Form, a visual assessment inspection form, incident report and an unauthorized discharge assessment.

Triggers: Corrective Actions are required to be taken when:

1. There is an unauthorized release or discharge, such as a spill, leak, or other unpermitted release of pollution that leaves your site;
2. Whenever a visual assessment or analytical monitoring violates a benchmark, numeric effluent limit, or shows evidence of stormwater pollution;
3. Control measures are not stringent enough to prevent stormwater pollution and has put the receiving water at risk of meeting applicable water quality standards;
4. A control measure was never installed, was installed incorrectly, or is not being properly operated or maintained; and
5. Inspectors (e.g. from DOEE or the EPA) or inspection reports notify the facility of compliance issues.

How: Corrective Actions are taken with the following:

- Review existing control measures outlined in Section 4, ensure they are being correctly followed, increase the frequency of their schedule, and adjust their procedures, if necessary
- Maintenance, modification, replacement, or installation of any stormwater controls
- Cleanup and disposal of spills, leaks, or other deposits
- Response to a permit violation

There are three steps for taking corrective action:

- 1) Immediate actions that provide a quick fix to prevent pollution from leaving the site and to initiate a response
- 2) Follow-up subsequent actions that provide a permanent fix to prevent the issue from recurring, and
- 3) Documentation of the actions taken.

Each has specific deadlines and requirements outlined below:

The following deadlines are not optional! They are required by the 2021 MSGP and missing them can lead to penalties. The EPA requires prompt response to conditions that require corrective actions to ensure that they do not persist indefinitely. Facilities that are not industrial are also expected to follow these deadlines, but do not need to notify EPA after 45 days as described in Step 2, Subsequent Actions.

Step 1. Immediate Actions

In Corrective Action Form: If a corrective action is needed, the facility immediately takes action to assess and address the discharge of pollutants until a permanent solution can be implemented. “Immediately” means **on the same day** the condition requiring corrective action is identified. However if a problem is identified too late in the day to initiate a corrective action, it will be performed the following work day morning.

The Facility Manager and the SWPPP team Lead will be notified of the corrective action.

In Routine Inspection Form and a Spill and Leak Report: When a corrective action has been immediately taken when an issue is identified and no additional actions are necessary to fix the issue, it can be recorded as “Immediate Corrective Action Taken” in the Routine Inspection Form or Spill and Leak Report with detailed information on what actions were taken included in the “Actions Needed / Actions Taken / Notes” section. No additional documentation is needed.

If a corrective action is unnecessary due to further corrective action being infeasible or the pollutant source naturally occurring in the background, the facility will document why it believes no corrective action is needed and upload the justification into the corrective action form the P2 Database.

Step 2. Subsequent Follow-up Actions:

Subsequent actions are taken when the immediate actions, taken in Step 1, do not address what triggered the corrective action and additional, follow-up actions need to be taken. Subsequent actions prevent the issue that triggered the corrective action from happening again, so that stormwater pollution doesn’t happen in the future. The SWPPT typically starts planning subsequent actions by reviewing the facility SWPPP and updating the SWPPP if control measures need to be added or revised.

If the SWPPT decides that additional actions are needed, a corrective action form is created by recording the issue as “corrective action needed” in the P2 Database. These actions are completed within one of the following time frames:

- 1. Before the next storm event, if possible, and within 14 calendar days**
- 2. Unable to complete the subsequent follow-up action within 14 calendar days:** The facility will document:
 - a. Why it is not possible to complete the corrective action within the 14-day time frame; and
 - b. A schedule for completing the work as soon as practicable after the 14-day time frame but no longer than 45 days after the discovery.
- 3. Unable to complete the subsequent follow-up action within 45 calendar days:** If unable, the facility will:
 - a. Take the minimum amount of additional time needed to complete the corrective action; and
 - b. **(MSGP)** Notify EPA Region 3 of its intention to exceed 45 days and provide them with the following:
 - Rationale for an extension
 - Estimated completion date

- Corrective action documentation outlined below in Step 3

EPA Region 3 contact information:

Address: U.S. EPA Region III

Office of NPDES Permits and Enforcement

NPDES Permits Branch, Mail Code 3WD41

1650 Arch Street

Philadelphia, PA 19103

Contact: Elizabeth Ottinger, EPA Region III, NPDES Permits Branch

Email: ottinger.elizabeth@epa.gov

Phone: (215) 814-5783

c. Internal documentation is saved with this SWPPP and includes:

- Why it is not possible to complete the corrective action within the 45-day time frame
- A schedule for completing the work

Changes to Control Measures: When corrective actions require changes or additions to the controls or procedures outlined in this SWPPP, the facility will **update the SWPPP within 14 calendar days** of completing the corrective action work. This can be done by manually editing the SWPPP or adding an attachment. All edits to the SWPPP should be documented in the SWPPP Modification Log in the P2 Database (in the “Certified SWPPP” tab). The SWPPT will consider the guidelines found in Section 3, subsection titled “Selection and Design of Control Measures,” when adjusting control measures.

Step 3. Corrective Action Documentation

Within 24 hours of discovering a condition that needs corrective action, the facility will document the following and maintain the documentation in the P2 Database.

1. **Date:** Date the condition was identified.
2. **Description of Incident:** Describe what was found and seen on site.
3. **Cause of Incident:** Describe what triggered the need for corrective action.
4. **Discharge to waterway/or storm drain?:** Did a pollutant enter a drain or waterway? Answer Yes or No.
5. **Immediate Actions Taken/ Actions to be taken in 2 weeks:** What was done to remedy the problem? Describe the immediate actions taken to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date and time the cleanup was completed, when notifications were made, and which staff were involved. Include any measures taken to prevent the reoccurrence of such releases.
6. **Signed and certified statement:** A signed and certified statement verifying that the information that is documented is correct is required. An e-signature email will be sent with the Corrective action is completed and will be kept with the corrective action documentation in the P2 Database.

If the event triggering the review is a permit violation (e.g., non-compliance with an effluent limit), correcting it does not remove the original violation. Additionally, failing to take corrective action in accordance with this section is an additional permit violation. EPA will consider the appropriateness and promptness of the corrective action in determining enforcement responses to permit violations.

(MSGP) Requirements Relating to Endangered Species, Historic Properties, and Federal CERCLA

Sites: For the MSGP permit, the facility needs to identify if it will affect Endangered Species, Historic properties and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites. Documentation of these assessments are included as attachments.

Endangered Species:	NO: No federally listed threatened or endangered species and/or their critical habitats are likely to occur in the action area. YES: Federally listed threatened or endangered species and their critical habitat are likely to occur in the action area, but the facility is not likely to adversely affect them. Information on the evaluation is found in the attachments.
Historic Properties:	NO: The facility has no potential to have an effect on historic properties under the National Historic Preservation Act (NHPA). YES: The facility has been noted to be a historic property by the District’s Historic Preservation Office (HPO). Information on the evaluation is found in the attachments.
Federal CERCLA:	NO: The facility is not located on a Federal CERCLA site.

SWPPP Modifications:

This SWPPP is a “living” document that may need to be updated following procedures set forth in this SWPPP.

When to update: This SWPPP is required to be updated and revised whenever there is a change in design, construction, operation, or maintenance at the facility that may change the potential for pollutants to be discharged to stormwater runoff. In addition, if the SWPPP is found to be ineffective in controlling the discharge of pollutants, it will be revised to correct the identified deficiencies, such as when a SWPPP revision is necessary to take corrective action.

When to review: At minimum, the SWPPP will be reviewed once every year and updated as necessary.

How to update: Document and track amendments made throughout the year and update the annual document. The SWPPP modification log in the P2 Database and the SWPPP review checklist should be used and kept under the “Certified SWPPP Report” tab. All SWPPP modifications are signed and dated to certify. The SWPPP checklist is available from DOEE at [\[email address\]](#).

(MSGP) Publicly available SWPPPs: Publicly available SWPPP information will be updated no later than **45 days after conducting the final routine facility inspection** for the year. If the SWPPP is made available online that means updating the online document. If SWPPP information was attached to the NOI, that means submitting a Change NOI form via NeT-MSGP within the 45-day deadline.

SWPPP Availability:

The facility will retain a complete copy of your current SWPPP required by this permit at the facility in any accessible format. This facility will utilize the P2 Database for document retention. **A complete SWPPP includes any documents incorporated by reference and all documentation supporting your permit eligibility, as well as your signed and dated certification page.** Regardless of the format, the SWPPP will immediately be available to facility employees, EPA, a state or tribe, the operator of an MS4 into which you

discharge, and representatives of the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) at the time of an on-site inspection.

(MSGP) Publicly Available: The 2021 MSGP requires a current version of this SWPPP be made available to the public. It will be made available one of the following ways:

1. Attached to the Notice of Intent (NOI) for coverage under the MSGP and updated using the Change NOI form in NeT-MSGP.
2. Post the current version online, updating the content of the website when SWPPP modifications are made
3. Include SWPPP information in the NOI (including specific elements outlined in 2021 MSGP Part 6.4.1.3) and updated using the Change NOI form in NeT-MSGP.

(MSGP) MSGP Permit Availability:

The facility will be able to access the MSGP permit and its attachments using this EPA website:

<https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp>

SECTION 4: SWPPP CERTIFICATION

Who should be signing this SWPPP?

1. Someone with authority. There are legal risks associated with signing the SWPPP. The agency’s director or someone to whom the director has delegated authority should sign.
2. Someone who makes decisions about operations and budget. The person signing should also have authority to make budgetary and operational decisions that influence SWPPP implementation.
3. **(MSGP)**For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this subsection, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: _____ Title: _____

Signature: _____ Date: _____

SECTION 5: ATTACHMENTS

Please check the attachments below that are included in this SWPPP:

- Additional/Edited Roles for Stormwater Pollution Prevention Team
- General Location Map
- Site Map
- Structural BMP Reference Documents
- Additional Sampling Data (MSGP)
- Unauthorized Non-Storm Water Discharge Inspection Report (MSGP)
- NOI (MSGP)
- Additional Sampling Data (MSGP)
- Analytical Benchmarking Reference Document (MSGP)
- Substantially Identical Discharge Points (MSGP)
- Endangered Species documentation (MSGP)
- Historic Property documentation (MSGP)
- A copy of the authorization email from EPA assigning the facility's NPDES ID (MSGP)
- Other:

Stormwater BMP Inspection and Maintenance

The table below outlines typical inspection and maintenance schedules for stormwater best management practices (BMPs) that are found at District facilities. These schedules are general recommendations and change depending on the level of traffic, land use, housekeeping practices, and drainage area size. Always follow manufacturer guidelines for inspection and maintenance and any stipulations laid out in a facility’s Stormwater Management Plan.

BMP Type	Inspection Schedule	Maintenance Schedule
Oil/water separator (OWS)	<ul style="list-style-type: none"> • 2x per year • After major storms 	<ul style="list-style-type: none"> • 1x per year • When sludge accumulates to 8⁺ inches or oil on top is 2⁺ inches deep • After a major oil spill impacting the OWS tank capacity
Sand filter	<ul style="list-style-type: none"> • 2x per year check sedimentation • 1x per year check filter medium and structural integrity 	<ul style="list-style-type: none"> • 1x per year for first chamber • When sediment accumulation exceeds 6 inches and when water remains in basin after 72 hours (i.e., no standing water) • Every 5 years remove and replace top sand layer, and as needed
Vortech filtration system	<ul style="list-style-type: none"> • 2x per year 	<ul style="list-style-type: none"> • 1x per year, or when sediment has accumulated to 12-18 inches
BaySaver filtration system	<ul style="list-style-type: none"> • Every 6 months 	<ul style="list-style-type: none"> • Every 1-3 years • When 2 feet of sediment has accumulated, or it shows a large accumulation of debris or oil
Stormceptor	<ul style="list-style-type: none"> • 2-4x per year 	<ul style="list-style-type: none"> • When sediment accumulates to approximately 15% of the unit’s total storage capacity • When oil is present in the oil inspection port
Trees	<ul style="list-style-type: none"> • Every 3 months during first 3 years, then 1x per year and After storm events 	<ul style="list-style-type: none"> • Water trees as needed, especially during first three years and during drought • When dead, diseased, or broken branches are found
Storm drains and trench drains	<ul style="list-style-type: none"> • Quarterly 	<ul style="list-style-type: none"> • 1x per year, or as needed, remove debris and replace filter fabric • When debris blocks the grate or entrance, and when sediment builds up to over 60% of the vault depth or within 6 inches of the lowest pipe
Infiltration trench or basin	<ul style="list-style-type: none"> • Quarterly 	<ul style="list-style-type: none"> • 1x per year clean out accumulated sediment, or as needed • When water remains in observation well after 72 hours (i.e., no standing water) • As needed replace pea gravel/topsoil and mow/prune vegetation removing the clippings
Green roof	<ul style="list-style-type: none"> • 2x per year during growing season 	<ul style="list-style-type: none"> • 1x per year hand weed to remove invasive and volunteer plants and to repair bare

		areas
Bioretention and rain garden	<ul style="list-style-type: none"> • 2x per year 	<ul style="list-style-type: none"> • 4x per year mow grass filter strips and check curb cuts/inlets for debris • 2x per year weed, remove trash, and rake mulch • 1x per year mulch, prune, and remove sediment • Every 2-3 years remove sediment and replace mulch and plants, and as needed
Permeable pavement and pavers	<ul style="list-style-type: none"> • 1x per year 	<ul style="list-style-type: none"> • 2-3x per year mechanically sweep pavement with street sweeper to prevent clogging • 1x per year spot weed grass application • Every 2-3 years remove sediment and fill voids, and as needed
Open channel systems <i>Including grass channel, dry swale, wet swale</i>	<ul style="list-style-type: none"> • 4x per year 	<ul style="list-style-type: none"> • Approximately 4x per year mow grass to maintain 4-6 inch height • 4x per year remove accumulated sediment, oil/grease, litter, and repair eroded areas • 1x per year plant to maintain 90% turf cover
Drain inserts	<ul style="list-style-type: none"> • Frequently. At least 8x per year 	<ul style="list-style-type: none"> • Several times a year replace insert, as necessary • When the structure does not drain completely within 48 hours after a storm event
Filter socks	<ul style="list-style-type: none"> • Frequently. At least 8x per year 	<ul style="list-style-type: none"> • Several times a year replace filter sock, as necessary • When sediment has accumulated to half the exposed height of sock, if torn, or when dislodged or ponding occurs

Sources:

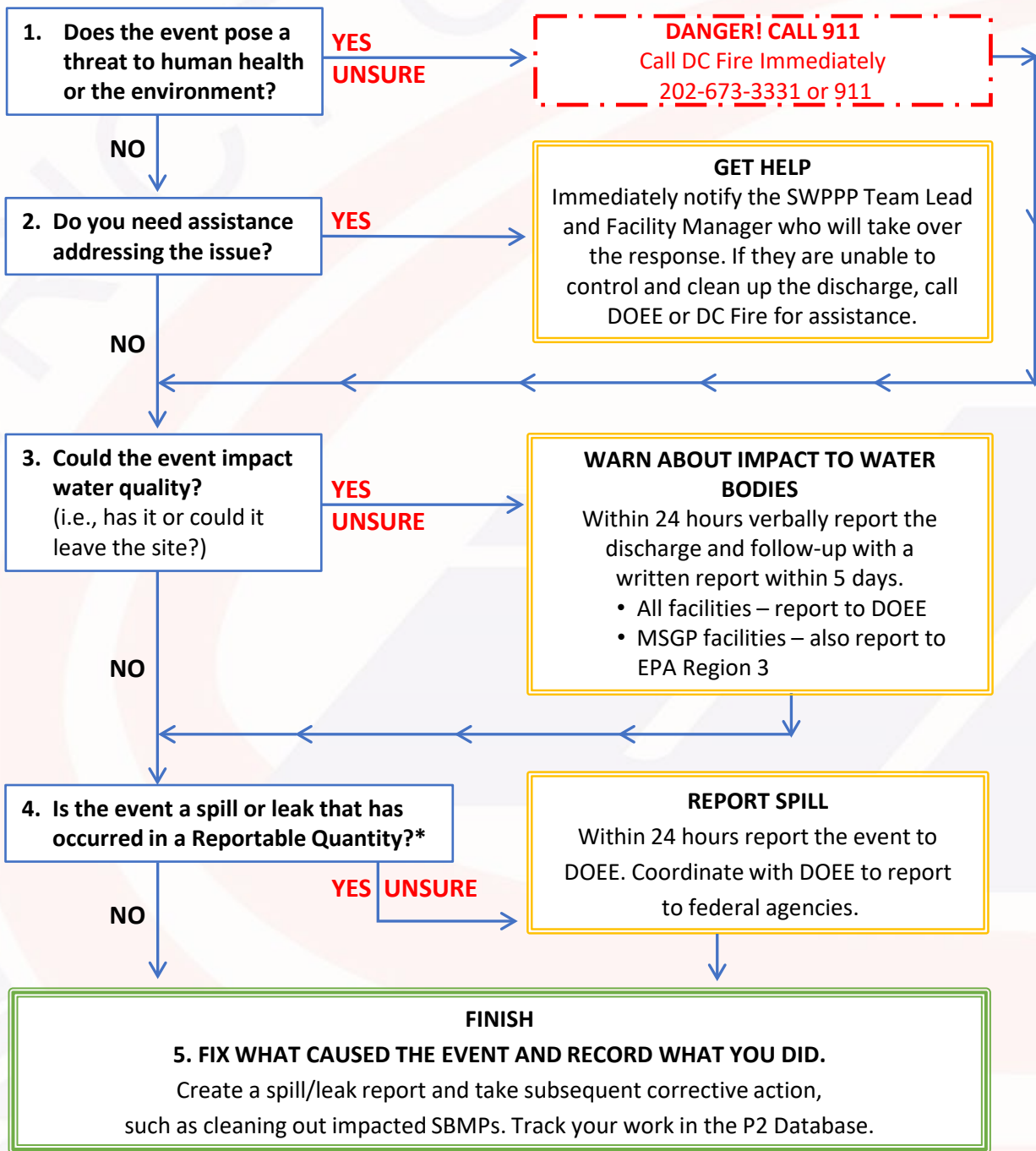
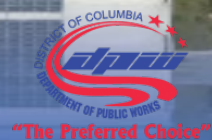
1. District of Columbia. 2013 Stormwater Management Guidebook: <https://doee.dc.gov/node/620102>
2. District of Columbia. Erosion and Sediment Control (ESC) Manual: <https://doee.dc.gov/node/1284771>
3. BaySaver. BaySeparator Technical and Design Manual: <https://baysaver.com/wp-content/uploads/2018/04/BaySeparator-Technical-and-Design-Manual.pdf>
4. BaySaver. BayFilter Inspection and Maintenance Manual: <https://baysaver.com/wp-content/uploads/2018/04/BayFilter-Maintenance-Sheet-02-18.pdf>
5. Contech. Vortechs® Guide: Operations, Design, Performance, and Maintenance: <https://www.portlandoregon.gov/bes/article/314404>
6. Imbrium Systems. Stormceptor Owner's Manual: http://www.imbriumsystems.com/Portals/0/documents/sc/technical_docs/Stormceptor%20Owners%20Manual.pdf
7. EPA. Oil/Water Separators: Best Environmental Practices for Auto Repair and Fleet Maintenance: <https://www.epa.gov/sites/production/files/2016-02/documents/separator.pdf>
8. King County, WA Department of Natural Resources and Parks. The Oil/Water Separator: How to select and maintain an oil/water separator: https://www.kingcounty.gov/~media/services/environment/wastewater/industrial-waste/docs/TechAssistance/OilWaterFS_0115.ashx?la=en

(MSGP) Analytical Benchmarking Reference Document

Subsector:	Parameters:	Benchmark Monitoring Concentration:
D1	Total Suspended Solids (TSS)	100 mg/L
K1	Ammonia	2.14 mg/L
	Chemical Oxygen Demand (COD)	120 mg/L
	Total Recoverable Arsenic (freshwater)	150 µg/L
	Total Recoverable Cadmium (freshwater)	Hardness Dependent
	Total Recoverable Cyanide (freshwater)	22 µg/L
	Total Recoverable Lead (freshwater)	Hardness Dependent
	Total Recoverable Mercury (freshwater)	1.4 µg/L
	Total Recoverable Selenium (freshwater)	1.5 µg/L for still/standing (lentic) waters; 3.1 µg/L for flowing (lotic) waters 290 µg/L
	Total Recoverable Silver (freshwater)	Hardness Dependent
M1	Total Suspended Solids (TSS)	100 mg/L
	Total Recoverable Aluminum	1,100 µg/L
	Total Recoverable Lead (freshwater)	Hardness Dependent
Q1	Total Recoverable Aluminum	1,100 µg/L
	Total Recoverable Lead (freshwater)	Hardness Dependent
	Total Recoverable Zinc Hardness (freshwater)	Hardness Dependent
S1	Biochemical Oxygen Demand (BOD5)	30 mg/L
	Chemical Oxygen Demand (COD)	120 mg/L
	Ammonia	2.14 mg/L
	pH	6.0 - 9.0 s.u.

Attachment B. Spill and leak response poster

IN THE CASE OF A SPILL OR LEAK BEGIN AT BOX 1



SMALL SPILL/LEAK CLEAN UP PROCEDURE

Step 1: Contain the spill or leak using a berm found in the spill kit or using plastic sheeting to cover any storm drains to which the spill or leak is traveling.

Step 2: Identify the leak/spill source and take necessary measures to stop it. If a leaky vehicle or equipment cannot be repaired promptly, place a drip pan, absorbent pads, or loose absorbent under the leak until it can be serviced.

Step 3: Clean up the spill or leak using contents of the spill kits. Use absorbent pads to wipe up spills and sprinkle loose absorbents over the spill/leak. Work the loose absorbent into the liquid using a non-sparking shovel or broom.

Notify SWPPP Team Lead if supplies in the spill response kit are running low.

Step 4: To dispose of used absorbents, sweep them up within 24 hours or before the next rain event using a non-spark shovel, broom, and/or dustpan. Dispose all absorbent materials (loose or pads) in a hazardous waste disposal bin, as they may be flammable.

Step 5: Record the spill or leak in the P2 Database yourself using the "Spill and Leak Report" or by notifying the Facility Manager or SWPPP representative.

HOW TO REPORT DISCHARGES:

- Pollution or questionable discharges originating off-site are observed running into storm drains
 - DOEE: Inspection and Enforcement Division: David Pilat, o. 202-281-3963, c. 202-805-1355, david.pilat@dc.gov, or Ibrahim Famuditimi: o. 202-535-2643, c. 202-439-5698, ibrahim.famuditimi@dc.gov
 - DC Water (CSS Areas) – 202-612-3400
 - MSGP – EPA Region 3: Peter Gold, o. 215-814-5236, gold.peter@epa.gov
- Leaking sewer line or water main:
 - DC Water – 202-612-3400
- Illegal dumping of solid waste:
 - Call 311, visit 311.dc.gov, or use the DC 311 smartphone app.

*A leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either [40 CFR Part 110](#) (oil), [40 CFR Part 117](#) (hazmat), or [40 CFR Part 302](#) (hazmat).

Attachment C. Automatically generated emails for Corrective Action Forms (14 and 45 day content)

The emails were generated by the P2 Database for fake Corrective Action forms at a dummy facility, called "P2 Test."

Elias, Clara (DOEE)

From: noreply@salesforce.com on behalf of Salesforce Support <sales.force@dc.gov>
Sent: Tuesday, August 3, 2021 11:41 AM
To: DOEE.P2 (DOEE)
Subject: Corrective Action Form 14 Day Reminder - CAF-0621 - P2 test

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Corrective Action Form 14 Day Reminder - CAF-0621 / P2 test

The following corrective action form (CAF) remains open after 14 calendar days. This is in violation of the Stormwater Pollution Prevention Plan (SWPPP) that requires the operator to correct issues at the facility before the next storm event or within 14 calendar days of the issue being found, whichever is shorter.

- CAF-0621 - [Click here to open](#)

If the operator has addressed the issue that led to the CAF: If the issue was addressed within 14 days, but the CAF was never closed, please document what was done to address the issue and close out the form in the P2 Database.

If the operator has not yet addressed the issue that led to the CAF, it must:

1. **Fix the issue:** The corrective action must be addressed as soon as possible, and not longer than 45 days after the issue was first found or there are additional requirements.
2. **Document actions:** Three items must be documented and uploaded to the P2 Database to demonstrate how the issue is being addressed. This is done by completing the "14 Day Infeasibility Explained" field in the CAF and by uploading relevant files into the "Notes & Attachments" box associated with the CAF, including:
3. **Record Completion:** When the corrective action is complete, the operator must:
 - a. Close out the CAF; and
 - b. If the CAF required changes to the site's structural or non-structural control measures, modify the facility's SWPPP within 14

calendar days.

If you have questions or need assistance, please contact DOEE's Pollution Prevention Team at DOEE.P2@dc.gov.



Elias, Clara (DOEE)

From: noreply@salesforce.com on behalf of Salesforce Support <sales.force@dc.gov>
Sent: Friday, September 3, 2021 11:41 AM
To: DOEE.P2 (DOEE)
Subject: Corrective Action Form 45 Day Reminder - CAF-0621 - P2 test

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Corrective Action Form 45 Day Reminder - CAF-0621 - /

The following corrective action form (CAF) remains open after 45 calendar days. This is in violation of the Stormwater Pollution Prevention Plan (SWPPP) that requires the operator to correct issues at the facility before the next storm event or within 14 calendar days, whichever is shorter. Now that it has been 45 days, additional actions are required.

- CAF-0621 - [Click here to open.](#)

If the operator has addressed the issue that led to the CAF: If the issue was addressed within 45 days, but the CAF was never closed, please document what was done to address the issue and close out the form in the P2 Database.

If the operator has not yet addressed the issue that led to the CAF, it must:

1. **Fix the issue:** Take the minimum additional time needed to fix the issue that led to the Corrective Action.
2. **Document actions:** Three items must be documented and uploaded to the P2 Database to demonstrate how the issue is being addressed. This is done by completing the "45 Day Infeasibility Explained" field in the CAF and by uploading relevant files into the "Notes & Attachments" box associated with the CAF including:
 - a. What has been done to address the issue;
 - b. Why it was infeasible to complete the corrective action within 45 calendar days; and
 - c. A schedule for completing the corrective action (this is required for industrial facilities, see 2021 MSGP Section 5.2.2).

3 Reporting:

- a. All Facilities: Notify DOEE's Inspection and Enforcement Division by emailing David Pilat (david.pilat@dc.gov) and Ibrahim Famuditimi (ibrahim.famuditimi@dc.gov).
 - i. Save a copy of your correspondence with DOEE in the P2 Database.
 - b. MSGP Facilities: Also notify Peter Gold, gold.peter@epa.gov, at EPA Region 3 that the time for completion of the corrective action will exceed 45 days. Include the information outlined in 2021 MSGP Section 5.1.3.2 in your correspondence.
 - i. Save a copy of your correspondence with EPA in the P2 Database.
4. **Record Completion:** When the corrective action is complete, the operator must:
- a. Close out the CAF; and
 - b. If the CAF required changes to the site's structural or non-structural control measures, modify the facility's SWPPP within 14 calendar days.

If you have questions or need assistance, please contact DOEE's Pollution Prevention Team at DOEE.P2@dc.gov.

