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

ANNUAL PROGRAM REPORT - PROGRAM YEAR 1 (JULY 3, 2018 – SEPTEMBER 30, 2019)

> WEARE GOVERNMENT OF THE WASHINGTON DISTRICT OF COLUMBIA

MURIEL BOWSER, MAYOR



KRISTA-SCHEVER

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#### 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 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 water of the United States.

Pursuant to Paragraph 49 of the AOC, the District is required to complete development and implementation of 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, and corrective action; identify staff and managers responsible for compliance at the Facilities; identify staff and managers responsible for conducting and tracking self-inspections; and specify self-inspection frequencies for stormwater control measures (SCMs), self-inspection frequencies to ensure good housekeeping, maintenance frequencies for SCMs, requirements for tracking self-inspections and corrective action, and timelines for completion and implementation of pollution prevention plans 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 required the District to submit a periodic Program report to EPA that:

- i. Documents implementation of the Program in the preceding Program Year;
- 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 Respondent 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 Respondent'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, the report is organized by reference to these requirements of paragraph 49.e. The report addresses the first Program Year, from July 3, 2018 (the effective date of the AOC) through September 30, 2019. The report is posted on DOEE's website page with the District's MS4 Annual Report (<u>https://doee.dc.gov/publication/ms4-discharge-monitoring-and-annual-reports</u>).

### **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 structural stormwater best management practices (BMPs); creating or updating stormwater pollution prevention plans (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 has developed an official inventory for the Program that identifies and prioritizes 33 municipal facilities that are part of the Program. 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 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 supervisor to the team leader
- 5. Facilities removed from the inventory with justification for why each was removed

DOEE conducted site walkthroughs at all the Program facilities to gather information with which to complete the inventory. The official inventory is regularly updated to reflect changes in P2 Program facilities, tier, potential sources of pollution, operations, and contact information. It now includes 33 facilities, of which 22 are Tier 1 and 11 are Tier 2.

During the reporting period, ten facilities were added to the inventory as information was discovered about their location and operations as well as when they were added to the District's critical source list. For example, four facilities that are located directly adjacent to, but not within, the MS4 were added to the critical source list because of the potential for them to drain to the MS4. An additional five facilities were removed from the list as the District clarified how it would categorize contractor-operated sites and as additional information was gathered on their operations. For example, one facility no longer was operational and all potential sources of pollution had been removed.

DOEE has shared the inventory, as well as actions necessary at each facility to implement the Program, both internally with appropriate program staff in DOEE and with other District agencies, the Deputy Mayor for Operations and Infrastructure (DMOI), and the Office of the City Administrator (OCA).

### 2. STRUCTURAL STORMWATER BMPS

DOEE encouraged self-inspection of structural stormwater BMPs at Program facilities. All Program facilities were evaluated to identify structural stormwater BMPs, or SCMs, onsite and to share typical maintenance and inspection frequencies with agency staff, using information in the current version of the District's Stormwater Management Guidebook and guidance for proprietary measures commonly found at Program facilities.

Program facilities with post-construction stormwater management plans (SWMPs) received regulatory preventative maintenance inspections, which according to the O&M plan schedule are required once every five years. During the reporting period, ten facilities were inspected (50 percent of the Program facilities with SWMPs).

### 3. STORMWATER POLLUTION PREVENTION PLANS (SWPPPS)

During the first program year, DOEE met with all agencies responsible for Program facilities to begin developing, updating, and finalizing SWPPPs. Of the 33 critical source facilities requiring SWPPPs, three facilities have completed up-to-date SWPPPs, 25 facilities have draft SWPPPs, and five facilities plan to draft their SWPPP in the fall of 2019 after requesting several-month extensions as of September 30, 2019. Eighteen of the 25 facilities with draft SWPPPs previously had completed SWPPPs; the new drafts incorporate important elements of the Program.

DOEE developed a Template SWPPP and SWPPP review checklist for municipal facilities on the official inventory, and provided training on how to develop SWPPPs on July 9, 2019, which was attended by eight people from three agencies that did not yet have a draft SWPPP. DOEE also provided site maps for any Program facility that requested one. DOEE's contractor mapped 13 sites and developed 16 site maps. They were reviewed by DOEE to ensure they met MS4 Permit and, when appropriate, MSGP requirements. Another SWPPP workshop was held on December 10, 2019.

DOEE received and reviewed 28 draft SWPPPs using a SWPPP review checklist to ensure all SWPPPs met MS4 Permit and MSGP requirements, where applicable. Several facilities submitted multiple drafts. DOEE shared feedback and comments with the agencies, and a copy of the checklist is kept on file at DOEE. DOEE provided significant content to three facilities SWPPPs to assist in getting a draft initially created or overhauled.

#### 4. SWPPP IMPLEMENTATION

#### I. P2 Database

DOEE has been working with the Department of General Services (DGS) to develop a P2 Database for District agencies to track SWPPPs, housekeeping, and self-inspections. DOEE and DGS signed a Memorandum of Understanding (MOU) on September 20, 2018 through which DOEE provided the resources to develop the P2 Database. It took longer than anticipated to finalize the MOU and get a contractor in place to develop it. DGS awarded a contract in early May 2019, and the contractor has since been working closely with DOEE to develop the application. DOEE provided 72 comments for the contractor during the initial testing phases. Three facilities and DOEE are currently beta testing the revised P2 Database and it is estimated that rollout will begin in January 2020 after beta testing is complete and the contractor has an ability to revise as appropriate and practicable.

#### **II. Employee Training**

DOEE's Pollution Prevention (P2) team communicated training requirements and conducted trainings throughout the reporting period. To ensure agencies understood the importance of this training, DOEE Director Wells issued a memo to sister agencies on May 22, 2019, to clarify training requirements and expectations. The memo requested that each agency submit a list of staff required to be trained under the Program, including staff and managers responsible for conducting and tracking self-inspections, and notify DOEE whether or not the agency intended to use DOEE as its trainer. DOEE received replies from all but one agency, which oversees two facilities impacted by the AOC. In doing so, DOEE has identified the SWPPP Team members for 30 of the 33 facilities currently on the list, and has worked to ensure all SWPPP Team members receive training every 12 months.

Currently, 82% of all the facilities that need annual stormwater training for facility staff are completely in compliance. Of those facilities that need additional staff training, all have trained some of the necessary staff members. DOEE provided 42 trainings that reached at least 1,158 people, including stormwater training for facility staff and snow plow operator training.

DOEE is developing an online training module for Program facility staff. DOEE tested the online training by launching an online training for DOEE staff in the summer of 2019. DOEE incorporated lessons learned from that experience to develop a draft online training module for Program facility staff in September 2019. DOEE expects to finalize and share the training with other agencies by January 2020.

DOEE also worked to connect agency staff with trainings offered by other entities. For example, DOEE approached EPA in the summer of 2018 to provide a self-inspection and monitoring workshop for municipal staff as part of the Program. The workshop evolved into a two-day training for staff from Tier 1 facilities on how to comply with the MSGP permit, including a field component in which participants learned how to conduct self-inspections and stormwater monitoring<sup>1</sup>.

#### **III. Corrective Action**

During the reporting period, the District clarified expectations for taking corrective and subsequent actions when potential violations are found both during self- and regulatory inspections. DOEE provided inspection reports to Program facilities and offered compliance assistance or initiated enforcement when violations were found.

DOEE identified issues, researched and communicated potential solutions, and assisted in identifying next steps for all facilities in

<sup>1.</sup> DOEE worked with EPA to develop the workshop during the reporting period and it was offered on October 3-4, 2019.

the Program. When necessary, DOEE also advocated for the support and resources needed to prevent recurrence of the issue. See section 6.1. on p. 6 for additional details on inter-agency work.

#### 5. P2 PROGRAM REGULATORY INSPECTION

Sixteen program facilities were inspected in accordance with District and federal stormwater pollution control regulations during the reporting period. The results of the inspections were shared with agency and facility staff, and DOEE offered compliance assistance if violations were found during the inspections.

In addition, DOEE incorporated results from the most recent regulatory inspections into site-specific training and into SWPPPs to ensure violations are and continue to be addressed.

#### 6. DISTRICT AGENCY ROLES AND RESPONSIBILITIES

#### I. Intra- and Inter-Agency Coordination

DOEE has been working closely with other District agencies to ensure Program facilities have the resources and information needed to implement the Program. During this reporting period, the following efforts have been made:

Type of Outreach	Number of Events	Number of People
Meetings	72	249
Training	42	1,158
Walkthrough	39	86
Correspondence (substantial phone calls/email)	35	20
Total	181	1,513

DOEE has conducted site walkthroughs at all the Program facilities. During these walkthroughs DOEE walked the facility with site staff and identified and discussed potential pollutant sources and any corrective actions that were needed. After each walkthrough, a baseline assessment was shared with each facility, which included observations and suggested actions for taking corrective action if potential violations of stormwater regulations were identified.

From August to the end of September 2019, DOEE hired two GreenZone Environmental interns to conduct twice-weekly check-ins at one Program facility to assist them with SWPPP implementation, conduct self-inspections, and help the facility staff understand what the Program requires. The interns were able to change storage and housekeeping practices and address more complex issues at the site. The facility has also taken concrete steps to finalize its SWPPP and to apply for MSGP coverage. DOEE is having one intern continue with this work in FY 2020, expanding her reach to at least one additional Program facility.

DOEE has identified staff members responsible for compliance with the Program at all of the Program facilities and is tracking this information in the official inventory. DOEE has also engaged supervisors and agency directors to build understanding and support for the Program.

The District holds regular interagency stormwater meetings that DOEE utilizes to communicate and coordinate implementation of the Program. The District's monthly MS4 Technical Working Group (TWG) began to include regular updates on the Program starting at the meeting on July 25, 2018, in order to promote staff-level coordination between agencies. On August 20, 2018, the District help a Stormwater Advisory Panel (SWAP) meeting that included a discussion of the Administrative Order on Consent and the Program with cabinet-level staff.

Starting in January 2019, DOEE also coordinated quarterly internal and District-wide meetings to provide a platform with which 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 discussed topics such as expectations of the Program, BMP maintenance, legal ramifications of non-compliance, success stories from Program facilities, managing on site contractors, and funding strategies. Starting in June 2019, DOEE began providing each agency with quarterly

updates summarizing their progress in implementing the Program. Starting in FY2020, DOEE has increased the frequency to every other month to keep agencies active and engaged in taking action.

During the reporting period, DOEE also began developing agreements with sister agencies to fund personnel that will assist with the implementation of the Program. DOEE signed an agreement with the University of the District of Columbia (UDC) on September 11, 2019. Agreements with DGS and the Department of Public Works (DPW) to fund stormwater experts to assist with Program management at these agencies are under development and are expected to be executed in FY 2020. This is in addition to the agreement DOEE put in place with DGS to fund the development of the P2 Database.

### 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 determined to take 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.

#### 2. STRUCTURAL STORMWATER CONTROLS

DOEE continues to work with sister agencies to assure the regular maintenance of structural stormwater BMPs at Program facilities.

**<u>Causes</u>**: DOEE has identified three main reasons why some BMPs have not been regularly maintained. One of the main reasons for inadequate maintenance is the lack of knowledge about existing BMPs, including maintenance requirements and the location of BMPs. There was also confusion over maintenance responsibilities, specifically whether BMP maintenance is the tenant agency's responsibility or the responsibility of the District's land management agency (DGS). Finally, some facilities did not always have the appropriate budget and funding mechanism in place with which to hire professionals to maintain the BMPs.

<u>Actions</u>: DOEE took a number of actions to improve frequency of BMP maintenance. First, DOEE notified staff at each facility of the known BMPs and the stormwater management plans that were located on site. DOEE provided site visits to help agencies locate and identify BMPs on their sites and offered to develop site maps for Program facilities to clarify BMP location (16 site maps were developed).

In addition, DOEE compiled a list of general recommendations for frequency of inspection and maintenance for stormwater BMPs commonly found at Program facilities, and shared the list at the February Program Managers Meeting, where DOEE had DGS clarify its responsibilities for BMP maintenance, and at the SWPPP workshop. When reviewing SWPPPs, DOEE also asked agencies to incorporate clear inspection and maintenance needs into SWPPPs.

See section 6.I. below (p. 9) for information on what the District is doing to ensure adequate funding for BMP maintenance.

#### **3. SWPPPS**

Many facilities still do not have finalized, certified, and/or current SWPPPs. SWPPP development and updating is a long process that involves capturing existing facility efforts and introducing new measures to control stormwater pollution. Once a draft is finished, DOEE reviews the draft to make sure it includes all of the elements required by stormwater regulations. Once the final edits are made, someone with oversight over the operations and budget of the facility needs to sign the certification statement in the SWPPP to certify it accurately describes what the facility is doing to prevent stormwater pollution. This process took longer than anticipated in the Program's tentative timeline.

**<u>Cause:</u>** DOEE received 28 draft SWPPPs to review, but many of the drafts needed substantial edits to include the elements necessary for it to comply with stormwater regulations. Several facility managers and administrative staff were helping to

draft the SWPPPs while also learning about stormwater control measures, and lacked confidence and expertise to update and edit SWPPPs on their own. Some facilities were unclear when their SWPPP needed to be submitted to DOEE for review, and so prioritized other efforts. Finally, a number of facilities have functionally complete SWPPPs that they are actively using to prevent stormwater pollution, but because the SWPPP has never been certified, it is still considered a draft.

**Actions:** DOEE set a clear deadline for Program facilities and communicated the deadline to higher level staff in order to elevate the issue and ensure agency staff had the necessary resources to develop a SWPPP. Tier 1 draft SWPPPs were due July 15, 2019, and Tier 2 SWPPPs were due September 16, 2019. DOEE developed a template SWPPP and held a workshop on July 9, 2019, at which staff could begin using the template to construct facility-specific plans. DOEE also met one-on-one, had various communications, and conducted site walkthroughs with staff developing SWPPPs to go over comments and to compile the necessary information to develop a draft SWPPP and discuss who should certify the SWPPP. This included 35 events and the SWPPP workshop.

In order to streamline and standardize feedback it provided on SWPPPs, DOEE developed a SWPPP checklist in July 2019. DOEE provided extensive comments on 28 draft SWPPPs to clarify expectations for what a SWPPP should include and to correct errors. In addition, DOEE provided funding to UDC to hire two interns starting in FY 2020 to assist with SWPPP development and implementation at UDC's three Program facilities. The MOU with UDC was finalized at the end of FY 2019, and extended into FY 2020.

#### 4. SWPPP IMPLEMENTATION

#### **I. General Implementation**

Some facilities still are still working to fully implement their SWPPPs.

**Causes:** Facilities with draft and new SWPPPs have not had sufficient time to implement the new plans because most were developed in the last quarter of FY 2019. Many facility staff had not received stormwater training prior to the Program, and were not clear what their responsibilities were towards preventing stormwater pollution. Some facilities are still working to purchase the tools and materials needed to implement their SWPPPP, such as spill kits and secondary containment. During the reporting period, there has been a high turnover of personnel at affected agencies and facilities.

<u>Actions</u>: DOEE expects housekeeping and storage practices to improve as SWPPPs are finalized and expectations are clarified for facility staff during annual stormwater training. For many Program facilities both of these actions occurred in the last quarter of FY 2019. When reviewing draft SWPPPs, DOEE ensured any violations and concerns identified in the most recent inspections of the facility were addressed with effective control measures. In-person trainings included site walkthroughs during which DOEE staff helped facility staff identify and address housekeeping and storage concerns at the facility. With these efforts, DOEE expects to see noticeable improvements in FY 2020.

DOEE experimented with providing additional on-site, staff assistance using GreenREADY trainees. The two interns visited one facility twice a week during the last quarter of FY 2019, and during their visits worked to help facility staff understand stormwater management, shift habits, and implement better housekeeping and storage practices. Based on the success of this approach, DOEE is continuing this effort in FY 2020 at new facilities.

DOEE is also developing an MOU to fund a full-time employee at DGS to help DGS manage its stormwater pollution prevention efforts. The DGS employee will be required to report to and communicate with DOEE regularly. As part of this agreement, a DOEE staff member will spend a portion of his or her time at DGS's headquarters to improve communication and coordination between the two agencies. DOEE anticipates this will effort will assist with the roll out and implementation of the P2 Database.

In FY 2018, DOEE applied for Clean Water Construction (CWC) Grant funding to address storage and vehicle washing needs at Program facilities. The project has been selected for funding in FY 2020, and will make funding available to install the storage infrastructure needed to allow for proper storage to take place at the facilities. DOEE is currently compiling requests from sister agencies for use of this funding.

#### II. P2 Database

The development of the P2 Database has been delayed by roughly six months.

<u>Causes:</u> The procurement process took much longer than anticipated and additional time was needed to finalize an MOU between the agencies, DGS and DOEE.

<u>Actions</u>: Despite the delay, DOEE expects to have a fully functional P2 Database rolled out in January 2020, allowing facilities to have six months to use the application prior to the end of Program implementation pursuant to the AOC. DOEE is working closely with the contractor to deliver the P2 Database on an expedited timeline and has engaged three other agencies to assist with beta testing.

#### **III. Employee Training**

The District is in compliance with employee training. All Program facilities have staff who are current on their annual stormwater training, and 82% of the facilities have trained all relevant staff. However, there is a three-month delay on developing the Program online training module.

**<u>Causes</u>**: Completion of the online training module has been delayed by a quarter. The tentative launch date was delayed due to increased requests for in-person training and compliance assistance at the end of FY 2019. DOEE staff prioritized in-person trainings and efforts to engage agency directors and higher-level staff that oversee Program facilities over online module development.

<u>Actions</u>: While the online training module is not fully complete, DOEE has made significant progress. Delaying the availability of the module allowed DOEE to incorporate important lessons learned from the online training module developed for DOEE staff. These lessons learned include utilizing a different online platform to administer the training and to revise the content and phrasing of questions used to gauge knowledge retention.

During this time, DOEE developed a standard operating procedure for staff that is absent for in-person trainings. This allows facility staff to take the online training module if an in-person training is missed, and requires SWPPP team members to review the site-specific training presentation, to take a facility-specific examination, and to certify they reviewed and understood the contents. This system ensures the different types of employees get the required information necessary to implement each facility's SWPPP and to be compliant with the District MS4 Permit and site-specific MSGP requirements.

The Program's online training module is expected to be completed in December 2019.

#### **IV. Corrective Action**

DOEE implemented the proposed corrective action strategy as outlined by the O&M plan document. No issues or deficiencies implementing the Program were identified during the program year.

Additional information on strategy specifics are included in paragraph 49.e.i., section 4.III (p. 5); in in paragraph 49.e. ii to iii., sections 1-4 (pp. 7-9); and in paragraph 49.e.v. (p. 11).

#### 5. P2 PROGRAM REGULATORY INSPECTION

DOEE implemented the proposed regulatory inspection program outlined by the O&M Plan. No issues or deficiencies implementing the program were identified during the reporting period.

#### **6. OVERARCHING INFLUENCES**

DOEE identified two factors that affected program implementation across multiple program elements; a need for improved budget planning, and for better inter-agency coordination. Below is a description of the actions the District is taking to address these two factors.

#### I. Budget Development

The District typically begins budget development two years in advance and finalizes a budget 18 months in advance of the start of a fiscal year. Program funding needs were not fully understood in time for the funding request to be incorporated into the FY 2019

#### and FY 2020 budgets.

Based on the Year 1 efforts including site walk throughs, site mapping, and other activities, the District now has a thorough understanding of the resource needs. DOEE is working closely with other agencies on the development of an FY21 budget to support the P2 Program. At a meeting convened by the Deputy Mayor for Operations and Infrastructure (DMOI) in September 2019, agencies affected by the P2 0&M Plan agreed that the District should develop a coordinated strategy to request and manage resources for pollution prevention and maintenance of stormwater management practices. Since that time, agencies have been working with the City Administrator, DMOI, and the Executive Office of the Mayor on a FY2021 budget enhancement to fund Program activities.

In the meantime, during the Program Year 1, DOEE has made funding and resources available to agencies with Program facilities to assist them with meeting Program requirements. This has included two MOUs with DGS – one to develop the P2 Database, and a second to fund a full-time employee that is an expert on stormwater permit compliance who can provide oversight and management of agency initiatives on Program implementation. DOEE also executed an MOU with UDC to fund interns to assist with developing SWPPPs and to coordinate annual stormwater training at the three UDC Program facilities.

DOEE has made its contractors available to Program facilities to assist with the SWPPP development. A DOEE contractor developed site maps for Program facilities, and DOEE expects to provide a subject matter expert in FY 2020 to provide environmental consulting services to assist DPW, which has 18 Program facilities, and DGS, the property manager for most Program facilities, with compliance with stormwater regulations and to assist with tracking and executing required actions.

#### **II. Inter-Agency Coordination**

Beginning in January and February of 2019, DOEE held quarterly internal and District-wide meetings to share progress on the Program, to identify next steps, and to build momentum and a sense of urgency among agencies. Internal meetings were held on January 9 and June 19, 2019. Meetings with Program facility managers and their supervisors were held on February 7, 2019, and June 30, 2019. Recognizing that efforts were appearing to fall behind, DOEE changed its outreach approach in June 2019. This change included:

- 1. Setting clear deadlines for training and SWPPP development. This lead to significant progress in the last quarter of FY 2019.
- Organized a director-level meeting organized by DMOI and the City Administrator on September 25, 2019. At this meeting, DOEE shared information with agency directors on actions needed to implement the Program and cost estimates for required activities.

### PARAGRAPH 49.E.IV. SUMMARY OF REGULATORY INSPECTIONS

#### **1. NPDES COMPLIANCE INSPECTIONS**

Since July 3, 2018, 16 regulatory inspections of municipal facilities were conducted by DOEE. Nine of the inspections found these facilities in good or fair condition related to the prevention of stormwater pollution, with only minor violations being identified. Seven of the inspections found the facilities in poor condition, with significant housekeeping and best management practice deficiencies and permit condition violations being identified.

Seven of the 16 facilities have obtained coverage under the MSGP, and two additional facilities applied for coverage during the reporting period and were granted coverage in early October 2019.

Condition of Facility	Inspected Facilities with MSGP Coverage	Inspected Facilities without MSGP Coverage	Total Number of Inspected Facilities
Good Condition	0	2	2
Fair Condition	5	2	7
Poor Condition	0	7	7
	5	11 <sup>2</sup>	16

#### 2. BMP MAINTENANCE INSPECTIONS

Since July 3, 2018, DOEE has inspected structural BMPs constructed at ten separate facilities. Of the ten inspections conducted, three of the inspections found BMPs at these facilities in good condition, one inspection found BMPs constructed at these facilities in fair condition, and six of the inspections found BMPs at these facilities to be in poor condition.

According to the following section, DOEE is working with sister agencies to correct deficiencies at facilities found to be in fair or 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 standard operating procedures and procurement of housekeeping resources.

Most of the Program facilities were constructed prior to the District's 2013 Stormwater Regulation, therefore stormwater BMPs installed at these facilities were not documented and tracked in the DOEE Stormwater Database. Despite this, DOEE has located stormwater management plans for 21 of the Program facilities. Currently, only six (6) of the facilities that are without stormwater management plans maintain regulated stormwater control measures and DOEE has conducted site visits of all the Program facilities to identify and document the stormwater controls at the facilities.

DOEE shared the available stormwater management plans with agencies responsible for the Program facilities. These plans include the relevant engineering plans, maintenance requirements, and maintenance schedules. To further assist these agencies with BMP maintenance, DOEE provided standard inspection and maintenance schedules for common BMPs installed at Program facilities and standard language for maintenance contracts to assure compliance with District and federal regulations.

DOEE assessed opportunities for consistent ongoing maintenance of BMPs, including assigning responsibility for maintenance to DGS, the District's property manager; however, other agencies have expressed concerns over DGS' responsibility for maintaining Program facility stormwater BMPs. Therefore, DOEE is currently developing an alternative maintenance strategy to assure consistent ongoing maintenance of BMPs at District facilities. DOEE plans to formalize this strategy in FY20.

<sup>2.</sup> Two of the 11 inspected facilities received MSGP coverage in October 2019.

### 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

### EXAMPLE STORMWATER POLLUTION PREVENTION TRAINING FOR O&M PLAN FACILITEIS

FY 2019



### COVERNMENT OF THE DISTRICT OF COLUMBIA MURIEL BOWSER, MAYOR

### AGENDA

### Introduction

# Expectations

### Inspection Report

### Review



# INTRODUCTION

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Photo by WTOP



# STORMWATER RUNOFF













### **ANACOSTIA RIVER**

# TWO TYPES OF SEWERS

- **2/3** of the District flows directly into local waterways with little to no treatment
- 1. Municipal Separate Storm Sewer System (MS4)
- 2. Combined Sewer System (CSS)







\* \* \*







# STORMWATER POLLUTION

Anything other than stormwater

- Dirt Trash
- Wash water and soaps
- Vehicle and equipment fluids
- Pesticides and fertilizers
- Paints and solvents
- Salt and Brine
- Rust
- Pet waste











### IMPACTS











### DRIPS ADD UP



### CLEAN WATER ACT



- 1972 Protects waterways from pollutionRegulates illicit discharges

  - Sets water quality standards

### National Pollutant Discharge Elimination System (NPDES) – Permit program





### **NPDES** Permits

### **Individual Permits**

- Sewer Systems: DC Water, District of Columbia
- Large Facilities: JBAB, NPS, DCA, et al.

### Multi-Sector General Permit (MSGP) for industrial activity

- Sector P = Land Transportation and Warehousing; Local Trucking (Solid Waste Collection)
- Sector N = Scrap Recycling; Scrap and Waste Recycling
- Sector K = Hazardous Waste Treatment, Storage, or Disposal



# ILLICIT DISCHARGES

**Illegal Releases** of material other than stormwater into a storm sewer system or directly into a waterway

### Types:

- Misconnected or leaking sewer lines
- Materials poured or swept into stormdrains
- Dumpster juice
- Wash water



# PERMIT REQUIREMENTS

- 1. Have a Stormwater Pollution Prevention Plan (SWPPP) and implement it
  - Control Measures
  - Self-Inspections
  - Spill and Leak Response
- Recordkeeping
- Annual SWPPP review
- 2. Hold annual stormwater training
- 3. Monitoring and reporting for industrial facilities





### 2013 EPA AUDIT

- In 2013 EPA audited the District MS4 Permit
- 5 District Facilities were inspected
  - SWMA Transfer Stations
- Numerous violations











### 2013 EPA AUDIT

# <u>ONE YEAR</u>

### to get DC Facilities into Compliance Facilities in the MS4 are a top priority



### PENALTIES

Types of Penalties	Fines	Imprisonment
<b>Negligent Violation</b>	\$2,500 - \$25,000	< 1 years
Knowing Violation	\$5,000 - \$50,000	< 3 years
Knowing Endangerment	< \$250,000	< 15 years
False Statement	< \$10,000	< 6 months or < 2 years

**Other types:** Civil & Administrative Penalties





# EXPECTATIONS



### EMPLOYEE EXPECTATIONS

- 1. Good Housekeeping
- 2. Spill Response
- 3. Maintenance
- 4. Inspections
- 5. Corrective Action





### 1. GOOD HOUSEKEEPING













### MATERIAL HANDLING

- 1. If it can spill, keep it in secondary containment
- 2. Clean up any spills & leaks
- 3. Keep it closed



### MATERIAL STORAGE

- 4. Put it away
- 5. Keep it clear of stormwater covered & elevated
- 6. Keep containers in good condition
  - Place in low-traffic areas
  - Replace when necessary



Metal drums are rusting & dented, & boxes of material have degraded



These supplies are elevated off the ground on pallets & covered with a tarp
# WASTE MANAGEMENT

- 1. Put waste in its place
- 2. Pick up litter
- 3. Keep it contained
  - Keep dumpsters & trash bins closed at all times
  - Service overflowing containers/piles
- 4. Dispose of hazardous wastes, universal wastes, and used oil at assigned collection locations







## **SPECIAL WASTES**

**HAZARDOUS WASTE.** Check hazardous waste lists. Exhibit any of following characteristics: **UNIVERSAL WASTE.** Subcategory of hazardous waste and includes certain:



NOT SURE? LOOK AT THE SAFTEY DATA SHEET (SDS) FOR MORE INFORMATION ON THE PRODUCT

# 2. SPILL RESPONSE



# PREVENT SPILLS, LEAKS & DRIPS

#### Check for drips and leaks

- Notify your manager when a leak is identified
- Clean it up
- Contain with absorbents or drip pans



Check under the vehicle or look at the parking spot when you pull out



This pavement has clear signs of drips and leaks



## CONTAIN DRIPS AND LEAKS





# AT THE PUMP

- 1. Park close to avoid stretching the hose
- 2. Keep nozzle upright
- 3. Never top off
- 4. Know where the emergency shut-off value is
- 5. If fuel is spilled clean it up and notify manager



# **PROMPT RESPONSE**

### Clean up spills and leaks immediately

- 1. Never use water. Use dry cleanup methods
- 2. Spill kits should be:
  - Stocked
  - Labeled
  - Easily accessible
  - Where they belong
- 3. Document all spills and leaks



## **NEVER USE WATER**



# CLEAN UP SPILLS



You see a spill/ leak



**Put absorbent down:** Circle around spill and then fill in Let it sit for up to 24 hrs.



Spill Cleanup Video: https://youtu.be/NeH98Rx7dOE



Sweep up used absorbent



**Dispose of properly** 

## SPILL CLEANUP VIDEO

# How to Use Your Spill Kit

# **SPILL REPORTING**

#### Call 911

Immediately if it gets into a public storm drain or cannot be controlled

### Call 202-535-2600

Monday-Friday, 9am to 5pm Within 5 days to report nonemergency spills and leaks

**Record in SWPPP** 



# 3. MAINTENANCE

Stormwater BMPs must be regularly maintained and inspected

- Owner usually responsible for maintenance
- Routine maintenance and when required
- Regularly inspect





## COMMON BEST MANAGEMENT PRACTICES















# 4. SELF-INSPECTION

### 1. Look around

## 2. Visit potential sources

- Storage
- Activities
- BMPs
- Past spills

## 3. Record your findings

- Be truthful & transparent
- 4. Take corrective action



# LYING CAN LAND YOU IN JAIL



# STORMWATER MONITORING

#### 1. Conduct monitoring and/or review reports

- Quarterly visual stormwater monitoring
- Benchmark monitoring
- Effluent limitation guideline monitoring
- Others

#### 2. Take corrective action (FIX THE PROBLEM)

• Document efforts





## 5. CORRECTIVE ACTION

## 1. Immediate Actions

- Same day
- Next day if identified late

## 2. Subsequent Actions

- Before next storm event or ≤14 calendar days
- > 14 calendar days
  - Document why it is taking so long
  - o Create Schedule
- 45+ calendar days [MSGP]

   Notify EPA Region 3



## YOUR INSPECTION REPORT



## **INSPECTION OVERVIEW**

#### Date

#### Status: Poor, Fair, or Good

#### Example Issues found:

- Storage of materials outdoors and not covered
- Evidence of leaks and spills
- BMPs in need of maintenance
- Maintenance records were not on site



## Example Site Map



Image from EPA SWPPP Template

\* \* \*

## REVIEW



# 1. Are Sources of Pollution stored inside or under cover?



#### Yes if kept closed



#### 2. Any visible spills or leaks?



# 3. Are spill kits available, labeled, stocked, and easily accessible? Yes but could be easier to reach



Spill kits. Are used absorbents and used cleanup materials disposed of in drums that are labeled, closed and in good condition?
 No



# Are waste containers kept covered/closed and in good condition? Yes





09/06/2016 12:19

# 5. Are stormdrains blocked?













6. Do sand filters, bioswales, or other stormwater filtration devices need service?













#### 7. Is the facility being maintained?







### **Mostly Yes**



## SUMMARY

Stormwater picks up pollution as it runs downhill

EPA regulates stormwater because it impacts the environment & our communities

#### Employee expectations include:

- 1. Good housekeeping practices
- 2. Prompt spill and leak response
- 3. Maintenance of stormwater structures
- 4. Regular inspections
- 5. Corrective actions





# You have completed stormwater pollution prevention training!

- You are now expected to implement what you learned today
- Failure to could lead to penalties up to \$250,000 for the facility **or for the individual**







# Questions?

### Clara Elias

**Pollution Prevention Coordinator** 

Watershed Protection Division

clara.elias@dc.gov

202-535-2261 doee.dc.gov



GOVERNMENT OF THE DISTRICT OF COLUMBIA MURIEL BOWSER, MAYOR

#### **GOVERNMENT OF THE DISTRICT OF COLUMBIA**

Department of Energy and Environment

#### THE DISTRICT OF COLUMBIA STORMWATER POLLUTION PREVENTION PROGRAM PLAN FOR DISTRICT OPERATIONS (O&M PLAN)

**WHAT:** The O&M Plan is a two-year plan for how District of Columbia facilities will regain and retain compliance with stormwater regulations.

**DEADLINE:** The District must implement the O&M Plan by July 1, 2020.

**BACKGROUND:** In 2013 the Environmental Protection Agency (EPA) inspected the District to ensure implementation of the citywide Municipal Separate Storm Sewer System (MS4) Permit. All of the District facilities that EPA visited during the inspection were out of compliance with the Clean Water Act.

The Department of Energy and Environment (DOEE) developed the O&M Plan as part of negotiations with EPA for a reduced fine. The District received an Administrative Order on Consent Docket No. CWA-03-2018-0019 on July 3, 2018.<sup>1</sup> This order included the O&M Plan as Attachment A, and requires the plan be implemented within two years.

**WHO?** The O&M Plan affects any facility that is (a) in the <u>MS4 Permit area</u><sup>2</sup>, and (b) a Critical Source facility that the District owns or operates, and does so for municipal operations.

Critical Source facilities are defined in the District MS4 Permit, and include industrial facilities, maintenance yards, and other sources of stormwater pollution. DOEE maintains the official list of Critical Sources.

\* DEPARTMENT

Any agency that operates or maintains a facility targeted by the O&M Plan is required to participate actively. <u>Find a full list here.</u><sup>3</sup> Member agencies include:

• DGS, DPW, DDOT, OSSE, MPD, FEMS, DCHA, DC Water, and UDC

Any District facility that needs to but fails to comply with the O&M Plan is in violation of the Administration Order and the Clean Water Act, and is at risk of receiving penalties.

#### MAIN ELEMENTS OF THE O&M PLAN:

- 1. Inventory and prioritize facilities
- 2. Maintain and inspect stormwater BMPs
- 3. Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) at all O&M Plan facilities
  - a. P2 Database online and mobile assistance for implementation and tracking
  - b. Annual employee training
  - c. Corrective action requirements
  - d. Industrial facilities only- Coverage under the Multi-Sector General Permit
- 4. Schedule for regulatory inspections
- 5. Clarify agency roles and responsibilities
- 6. Tentative schedule for O&M Plan implementation

**DOEE ASSISTANCE:** DOEE is able to provide compliance assistance to assist sister agencies with implementing the plan. If you need assistance, please contact:

Clara Elias, O&M Plan coordinator clara.elias@dc.gov, o. 202-645-4231

3. Official O&M Plan Inventory: <u>https://dcgovict-my.sharepoint.com/:x:/g/personal/clara\_elias\_dc\_gov/</u> EafJCHkzNBhIsNax67LXlgsBfH6ApBSuBMRbstX7xmIfDQ?e=vhVxlY



<sup>1.</sup> Administrative Order on Consent Docket No. CWA-03-2018-0019: <u>https://dcgovict-my.sharepoint.com/:b:/g/personal/</u> <u>clara\_elias\_dc\_gov/EXNHFAaqhPZNg5nbhwumlkwBLYrfsKsb2EHUn2D2-E-t1Q?e=KAQtX2</u>

<sup>2.</sup> MS4 map: <u>https://dcgis.maps.arcgis.com/apps/webappviewer/index.html?id=15ab232cad21477483ba25ee9c50a933</u>

#### AGENCY RESPONSIBILITIES:

#### Agencies that operate or maintain facilities covered by O&M Plan

- 1. SWPPPs:
  - a. Develop, review, and certify each SWPPP
  - b. Regularly update each SWPPP to accurately reflect operations
  - c. Provide DOEE with contact information for employees responsible for facility
- 2. Routine inspections:
  - a. Conduct self-inspections
  - b. Inspect and maintain stormwater BMPs
- 3. Recordkeeping and reporting:
  - a. Record and track P2 efforts in the P2 Database
  - b. Report on P2 and self-inspection activity
- 4. Coordinate with DOEE to train relevant staff and contractors
- 5. Request compliance assistance, as needed

#### DOEE, which is responsible for administering the O&M Plan

- 1. SWPPPs:
  - a. Assist sister agencies with developing SWPPPs
  - b. Stormwater BMPs- identify and share typical maintenance needs
  - c. Develop a template SWPPP
  - d. Oversee P2 Database development and use
- 2. Employee Training:
  - a. Provide municipal employee trainings, as requested
  - b. Review content of trainings if delivered by sister agencies
- 3. Inspections and recordkeeping
  - a. Conduct regulatory inspections
  - b. Monitor and assess implementation of the O&M Plan
- 4. Provide compliance assistance, as requested



#### **GOVERNMENT OF THE DISTRICT OF COLUMBIA** DEPARTMENT OF ENERGY AND ENVIRONMENT

#### **DOEE Stormwater Pollution Prevention Plan Template**

This template Stormwater Pollution Prevention Plan (SWPPP) is designed for District of Columbia municipal facilities. It identifies potential pollutants on site and assists facilities with choosing control measures to prevent these pollutants from entering the waters of the District.

Before filling in the template, the facility needs to determine whether they need to have a Multi-Sector General Permit (MSGP) for industrial stormwater runoff. There is a flow chart provided to assist in this determination. From there, the template has been marked to designate **MSGP or NON-MSGP** depending on the permit needed.

Tips for completing the template:

- Most sections include instructions and space for your facility's specific information. You should read these instructions before you complete that section.
- To make it easier to complete, the template uses red text or yellow highlighted areas where the facility is expected to enter information.
- There are template forms and other documents referenced in the template SWPPP in the attachment section. The documents found in the attachment section also need to be filled in and should be included in the final draft of the SWPPP.
- There is an appendix (noted in purple text) that is referenced throughout the SWPPP; it is there to provide additional instructions/assistance to complete several sections.
- This template can be used in paper or electronic form.

This template has been developed by DOEE's Watershed Protection Division, Partnership and Environmental Conversation Branch. If there are questions, please contact Clara Elias at (202) 645-4231 or <u>clara.elias@dc.gov.</u>





#### **Stormwater Pollution Prevention Plan**

for:

Insert Facility Name Insert Facility Address Insert Facility Telephone Number (if applicable)

#### SWPPP Contact(s):

Insert Facility Operator Insert Name Insert Address Insert Telephone Number Insert Fax/Email

#### **SWPPP Preparation Date:**

\_\_\_/ \_\_\_ / \_\_\_\_\_



#### **Table of Contents:**

#### Introduction

#### SECTION 1: Site Description

- 1.1 **Facility Information**
- 1.2 **Contact Information/Responsible Parties**
- 1.3 Stormwater Permits
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- 1.5 Stormwater Pollution Prevention Team
- 1.6 **Facility Site Description**

#### **SECTION 2: Potential Pollutant Sources**

- 2.1 **Potential Pollutants**
- 2.2 Spills and Leaks2.2.1 Potential Spills and Leaks2.2.2 Past Spills and Leaks
- 2.3 Unauthorized Non-stormwater Discharges Documentation (MSGP)
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#### SECTION 3: Stormwater Control Measures

- 3.1 Best Management Practices (BMPs)
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- 4.1 Inspections
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- 4.4 **Requirements Relating to Endangered Species, Historic Properties, and Federal CERCLA Sites (MSGP)** 4.4.1 Endangered Species
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- 4.5 Corrective Actions
- 4.6 SWPPP Modifications

#### **SECTION 5: SWPPP Certfication**

SWPPP ATTACHMENTS
# **INTRODUCTION:**

The District of Columbia has two types of sewer systems that collect and transport stormwater and sewage. Approximately two thirds of the District has separate sewer systems that are comprised of two independent piping systems: one system for sanitary sewage and one system for stormwater. This is called the municipal separate storm sewer system (MS4). The MS4 discharges into portions of the Potomac, Anacostia, and Rock Creek waterbodies. The remaining one-third is served by the combined sewer system (CSS).



Under the DC Water Pollution Control Act and the federal Clean Water Act, the discharge of pollutants to the 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, and accidental releases must be contained and properly disposed of before they can impact the Districts waters.

Facility activities, such as material handling and storage, maintenance and cleaning of vehicles and equipment, 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, and into nearby waterbodies, where it degrades environmental and human health.

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. Industrial facilities within the MS4 are 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.

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 toxic metals, pesticides, fertilizers, vehicle oils, dirt particles, trash, and leaves. The stormwater and pollutants drain into storm drains, where they enter the local storm sewer. If in the MS4, they will drain into the District's streams and rivers and eventually into the Chesapeake Bay.

A Stormwater Pollution Prevention Plan (SWPPP) is a site-specific, written document that:

- Identifies potential sources of stormwater pollution at a facility
- Describes practices to reduce pollutants in stormwater discharges from the facility
- Identifies procedures the facility takes to comply with stormwater regulations



- 1- Industrial facilities within the MS4 or direct drain areas of the District need a federal permit under the National Pollutant Discharge Elimination System. The EPA has simplified the process with the Multi-Sector General Permit for Industrial Activities (MSGP). Facilities can apply to be covered under the MSGP permit or apply for an individual permit, which is a longer, more complex process. This flowchart assumes coverage under the MSGP will be pursued.
- 2- Critical Sources of stormwater pollution are defined in the District MS4 Permit and include:
  - Automotive repair facilities
  - Automotive fueling stations
  - Automotive wash facilities
- 3- All facilities are encouraged to develop and implement a stormwater pollution prevention plan (SWPPP). SWPPPs are required for industrial facilities in the MS4 and are strongly encouraged for critical sources of pollution. All DC municipal facilities that are identified as critical sources are required to have a SWPPP.

## How to Use This Guide

This SWPPP provides an overview of what the <u>Enter Facility Name</u> is doing to prevent stormwater pollution from entering the District of Columbia's waterways. It was designed to be a "living document" that is regularly updated and revised as the facility and its operations change and grow.

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 physical structures (structural BMPs) as well as procedures and schedules (non-structural BMPs).

**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.

# **SECTION 1: SITE DESCRIPTION**

## **1.1 General Facility Information:**

Name of Facility:	
Facility Address:	
Latitude:	Longitude:
º N (decimal)	º W (decimal)

Detailed information on determining facility's latitude and longitude can be found at: <u>http://www.wikihow.com/Find-the-GPS-Coordinates-of-an-Address-Using-Google-Maps</u>

Facility size: \_\_\_\_\_acres

Is the facility in DC's MS4?

To determine the location of facility use

http://dcqis.maps.arcqis.com/apps/InformationLookup/index.html?appid=a60a0086b47c4e35a638b7a8abe 5954f

Yes: This facility is located in the District's MS4 sewer system. The MS4 operator is the Government of the District of Columbia.

No: This facility is located in the District's Combined Sewer System, which is operated by DC Water.

# **1.2 Facility Contact Information:**

Facility Oper	ator:
Name:	
Address:	
Telephon	e Number:
Email:	
Facility Own	er:
Name:	
Address:	
Telephon	e Number:
Email:	
SWPPP Cont	act:
Name:	
Address:	
Telephon	e Number:
Email:	

Insert Facility Chain of Command Chart if it will be helpful

## **1.3 Activities:**

Fill out section A and then continue to B, C and D if needed. In final, delete what does not pertain to the facility.

This locations operations include the following activities:

#### Α.

## Table 1. Activities at the facility

Activity	NAICS or SIC Code	Is the Activity Industrial? <sup>*</sup>	
		□ <sub>Yes</sub> □ <sub>No</sub>	
		□ <sub>Yes</sub> □ <sub>No</sub>	
		□ <sub>Yes</sub> □ <sub>No</sub>	
		□ <sub>Yes</sub> □ <sub>No</sub>	

\* Look up each activity in the Multi-Sector General Permit (MSGP) for industrial stormwater runoff using its NAICS or SIC code to see if it is considered industrial by the EPA: <u>Link for</u> SIC codes for MSGP Activities

- Search for a NAICS code: <u>https://www.census.gov/eos/www/naics/</u>
- Search for a SIC code: <u>https://www.osha.gov/pls/imis/sic\_manual.html</u>

## **B.**

*If Facility has a previous or current NPDES identification number, please list:* NPDES ID:

# С.

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.

## D.

## DC Municipal Facilities

This facility is a part of the 2018 EPA consent decree and its administrative order, and therefore a part of the District's Stormwater Pollution Prevention Programs Plan for District Operations (O&M Plan). The facility has been identified by a Critical Source facility due to its location in the MS4 and facility operations being potential sources of pollution. This SWPPP and its outlined BMPs will ensure compliance with the administrative order.

Any district facility that needs, but fails, to comply with the O&M Plan, is in violation of the EPA administrative order and the Clean Water Act.

# **1.4 Discharge Waters Information:**

Before continuing with this section, the facility's discharge waters need to be found. To look up the facility's discharge waters, use this online map:

http://dcgis.maps.arcgis.com/apps/webappviewer/index.html?id=92dca0c84d974a0c9ecc0858a110bf2d Use this information to fill out the section below

This facility is located in the following sewer system: *Please check all that apply* 

Municipal Separate Storm Sewer System (MS4)

Combined Sewer System (CSS)

Both MS4 and CSS. Please describe location of the boundary between the two sewer systems.

#### To which watershed and sub-watershed does the facility discharge?

Please enter the watershed in which the facility is located. It is possible parts of the property are in different watersheds. If so, please list each watershed and sub-watershed below with a short description of where the area is located. The facility is located in the following watershed(s):

Area Please describe	Watershed	Sub-watershed	Impaired Waters <sup>1</sup>	Special Waters of the District <sup>2</sup>
e.g., 1. Employee parking lot	Anacostia River	Hickey Run		
1.				
2.				
3.				

#### Table 2. Watersheds within which the facility is located

- 1. Please check the box if the area discharges to impaired waters. Instructions to find impaired waters, pollutants and TMDLS are found in Appendix B.
- Does this facility discharge industrial stormwater into Rock Creek, Battery Kemble, or any of their tributaries? Rock Creek and its tributaries and Battery Kemble and its tributaries are considered Special Waters of the District of Columbia (SWDC), and are Tier 2.5 waters.
   <u>Please check the box if the area discharges to SWDC.</u>

More information on Tier 2.5 waters can be found at: <u>https://19january2017snapshot.epa.gov/sites/production/files/2017-</u> <u>01/documents/2017 cap final appendix f - tier 3 tier 2 tier 2.5 waters.pdf</u>

#### 1.4.1. Impaired Waters:

Does the facility discharge into "impaired waters"? Please refer to Table 2.

**NO:** This facility does not discharge into impaired waters.

VES: This facility discharges into \_\_\_\_\_\_, which is considered an "impaired waters". The pollutants that cause its impairment that may be present in the industrial discharges of this facility are

The Total Maximum Daily Load (TMDL) has been completed for these pollutants and is:

## 1.4.2. Effluent Limitation Guidelines:

Are any of the facility's stormwater discharges subject to effluent limitation guidelines (ELGs)? Instructions to find ELG guidelines are in Appendix C

## Check one:

 $\Box$ NO: There are no effluent limitation guidelines that apply to this facility.

□YES: Effluent limitation guidelines that apply to stormwater discharges are

# **1.5 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.

For this section identify SWPPT members, and for each member include contact information and select responsibilities. Repeat for each member.

Team Members:	Contact Information	Individual Responsibilities		
Name of Member/Title	Phone	Select all that applies for each team member:		
	Email address	1. Facility Manager, ensures implementation of		
		plan, Spill Response Coordinator		
		2. Alerts team members to any problems,		
		changes, small spills, drips, or leaks, and		
		addresses needed remediation		
		3. Provides training on the SWPPP to other		
		team members and new employees		
		4. Conducts or manages quarterly sampling		
		5. Conducts or manages analytical monitoring		
		(if needed)		
		6. Performs routine self-inspections		
		7. Is in charge of 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.		
		8. Reports and records any spills, leaks, and		
		unpermitted or unusual discharges		
		9. Ensures that when corrective actions are		
		identified they are completed and properly		
		documented in the SWPPP		
		10. Updates and edits the SWPPP as needed		
Repeat for each member				
Repeat for cach member				

#### **Table 3. Stormwater Pollution Prevention Team**

# **1.6 Facility Site Description:**

This section is a narrative description of the facility and its operations. Please use the questions listed below as suggestions of what may be included. Please add any information that the facility feels is important to illustrate in understanding the property and its operations.

What types of operations occur at the facility?

What DC agency/agencies (if appropriate) operate on site? If there are multiple agencies, please identify which areas of the facility each one uses/operates.

*Provide a general description of the physical characteristics of the facility. What are the buildings/non-stormwater structures on site?* 

Provide a general description of the activities that are conducted at the facility, with special focus on activities that could cause stormwater pollution, such as those that take place outdoors, involve hazardous materials, or are vented to the outside. Include activities performed inside as well.

Include a description of where the facility is located geographically and into which watershed it drains. Include if it is in MS4, CSS, or a combination of both.

Where are the stormwater inlets located at the facility? Include a map of the drainage and pipes if available.

Where are the outfalls that receive the facility's stormwater runoff (Definition in Appendix D)? Where is the representative sampling conducted on-site (same or different from the outfall)?

The table below can be used to help illustrate the outfalls.

Outfall Name	Outfall Location Area of facility from which outfall o	

#### Table 4. Outfalls

Describe any areas of the facility that receive run-on from adjacent properties. Run-on is rain or snowmelt that drains onto the facility from a neighboring site and could contain pollution that is unrelated to facility operations.

## What types of structural stormwater BMPs does the facility have?

Structural stormwater BMPs are any structure that diverts, drains, or filters stormwater runoff, such as berms, storm drains, rain gardens, swales, dry or wet ponds, oil/water separators, cisterns, and filtration devices (sand filters, Stormceptors, Vortex systems, etc.). *Structural BMP definitions and typical maintenance schedules are located in Appendix E.* 

This site manages stormwater runoff by having structural BMPs in place. These structural BMPs are

These structures Do Do Not (Please check one) have a DOEE Stormwater Management Plan (SWMP)

## "Do":

These structures are maintained per the DOEE's approved SWMP #:\_\_\_\_\_\_

Copies of this plan/these plans are in Attachment \_\_\_\_\_ (Fill in the letter of the attachment if including).

## Other:

Are there any other entities that operate on site (mobile repair, other agencies or companies that use space at the site, etc.)? If there are areas of the facility that are utilized or shared by other operators, it is important to clarify who is responsible for those areas and which activities relate to operations and this SWPPP, and which activities other operators are responsible for overseeing.

## Maps:

A general location map and the site map for this facility are found in Attachment A and B (*Put these maps in the attachment section in the finalized document*).

# SECTION 2: POTENTIAL POLLUTANT SOURCES

# 2.1 Potential Pollutants:

The following activities 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.

The table below will be used to determine potential pollutants from the facility based on the activities conducted. Place a check mark by each activity listed below that is performed at the facility. Please include additional activities that are performed, but not listed.

ACTIVITY	Potential Pollutants	
Fueling	Fuel, Oil, and Heavy Metals	
Vehicle Washing and	Chlorinated Cleaning Solutions/Detergents, Degreasers, Oil,	
Maintenance	Grease, Heavy Metals, Phosphorus, Salts, Rust, Soil, and Grit	
Outdoor Vehicle, Vehicle	Sulfuric Acid, Galvanized Metals, Heavy Metals, Oil, Grease,	
Parts, and Equipment	Hydraulic Fluids, Rust, Dirt, Grit, and Debris	
Storage and Parking		
Painting Areas	Paint, Paint Solids, Paint Thinners, Heavy Metals, and Dust	
Outdoor Storage	Oil, Grease, Heavy Metals, Rust, and Other Materials: Please list	
Hazardous Material Storage	Oil, Grease, Heavy Metals, Rust, and Other Materials: Please list	
(Indoor or Outdoor)		
Building and Grounds	Pesticides, Cleaning Solutions, Drain Cleaners, Degreasers, Salts,	
Maintenance of Facility	Rust, Soil, and Grit	
Scrap Metal Processing	Heavy Metals, Mercury, Hydraulic Fluids, PCBs, Oil, Fuels, Grease,	
	Chemical Additives, Lead, and Battery Acid	
Outdoor Stockpiling of	Oil, Grease, Heavy Metals, Phosphorus, Salts, Soil, Grit, and Other	
Materials	Material: <i>Please list</i>	
Trash/Recycling/Illegal	Metals, Oil, Grease, Rust, Soil, Grit, Litter, Leaves, Other Organic	
Dumping	Litter, and Other Materials: <i>Please list</i>	
Cold Weather Activities	Salts, Soil, and Grit	
Loading/Unloading Areas	Material Being Loaded/Unloaded: Please list	
Facility Exhaust Pipes	Particulate Matter and Volatile Organic Chemicals	
List any other activity		
	Fueling Fueling Vehicle Washing and Maintenance Outdoor Vehicle, Vehicle Parts, and Equipment Storage and Parking Painting Areas Outdoor Storage Hazardous Material Storage (Indoor or Outdoor) Building and Grounds Maintenance of Facility Scrap Metal Processing Outdoor Stockpiling of Materials Trash/Recycling/Illegal Dumping Cold Weather Activities Loading/Unloading Areas Facility Exhaust Pipes	

#### **Table 5. Potential Pollutants**

# 2.2 Spills and Leaks:

The facility has listed tables below that indicate the "Potential Spills and Leaks" and "Past Spills and Leaks".

Significant spills and leaks include, but are not limited to, releases of oil or hazardous substances in excess of quantities that are reportable under CWA Section 311 (see 40 CFR 110.6 and 40 CFR 117.21) or Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC §9602. More information can be found at <u>https://www.epa.gov/emergency-response/when-are-you-required-report-oil-spill-and-hazardous-substance-release</u>

## 2.2.1. 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.

#### **Table 6. Potential Spills and Leaks**

Location Where Spills and Leaks Could Occur:	Point(s) of Discharge that Could Be Affected:	

## 2.2.2. 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.

#### **Table 7. Past Spills and Leaks**

Date:	Description:	Point(s) of Discharge Affected:

# 2.3 Unauthorized Non-Stormwater Discharges Documentation (MSGP):

Non-stormwater discharge is any discharge from the facility that is not composed entirely of rainfall or snowmelt runoff. Allowable non-stormwater discharges could include:

- 1. Potable water, including water line flushings
- 2. Irrigation drainage
- 3. Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling and regulations
- 4. Routine external building wash down that does not use detergents
- 5. Foundation or footing drains where flows are not contaminated with process materials

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

## Further instructions on how to conduct these evaluations are found in the Appendix I.

## Fill in the following

-
Date of evaluation:
Description of evaluation criteria:
List of outfalls or discharge points evaluated:
Actions taken to eliminate unauthorized discharges:
Or

There are no known unauthorized discharges on site.

# 2.4 Salt Storage:

Does the facility have large-scale salt storage (salt domes, tarped piles, etc.) on site (YES) or just general smallscale facility snow removal operations (NO)? Please check one.

**YES:** The facility does have large-scale salt storage on site.

- 1. Provide a narrative of the procedures used to minimize the exposure of salt to stormwater when stored and when adding or removing materials from the pile.
- 2. Describe the location at site where each control and/or procedure will be implemented.
- 3. Describe structures at site that either cover or enclose salt storage piles or piles containing salt, or that prevent the discharge of stormwater from such piles.

**NO:** The facility does not have large-scale salt storage on site. Specific control measures in place to minimize exposure are listed in Section 3.1 in the Best Management Practice table under "Snow and Ice Removal Operations".

# 2.5 Sampling Data Summary (MSGP):

## Is the facility a new discharger (first time MSGP permittee)?

**YES:** New dischargers and new sources need to provide a summary of any available stormwater runoff data the facility has. This information is attached as Appendix \_\_\_\_\_.

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

**NO:** Existing dischargers need to provide a summary of all stormwater discharge sampling data collected at the facility during the previous permit term. The summary should include a description that summarizes the collected sampling data to support identifying potential pollution sources at the facility.

# SECTION 3: STORMWATER CONTROL MEASURES

# 3.1 Best Management Practices (BMPs):

(Facility name) implements the following control measures in order to prevent stormwater pollution. The control measures address the potential pollutant sources outlined in Section 2 by minimizing pollutant exposure to stormwater, implementing good housekeeping procedures, maintaining control measures, preventing spills, controlling sediment and erosion, managing runoff, and ensuring employees are trained on how to implement these measures.

This is the most important section of the SWPPP because it outlines what the facility is doing/will do to prevent stormwater pollution. This template has been designed so all facilities have a "General Housekeeping" section and measures specific to activities that are performed on site are included in additional sections.

**BMPs are listed by activity type. Only select a BMP and a schedule for it that works best for the facility**. For each BMP, select a scheduled timing (the facility determines timing). Specific dates can be helpful to ensure that the BMP is being performed in a timely fashion. If there is either an activity or a BMP that the facility conducts, but is not listed, please fill in as well.

This section should be updated regularly as the facility's operations change to ensure it accurately describes what is being implemented on site. If there is a discharge of pollution or pollution is found in the facility's stormwater runoff, additional BMPs should be added to ensure stormwater pollution is prevented in the future.

Table 8. BMPs	
Facility's BMPs	Schedule
General Housekeeping	
	List specific
1. Liquids are not poured or allowed to drain into a storm drain.	<mark>due dates</mark>
	and/or specific
2. Storm drain inlets are stenciled or marked so staff knows the inlets drain to the river.	<mark>time frames</mark> ,
	such as:
3. Spills and leaks are cleaned up.	"Ongoing"
	"Daily"
<ol><li>Spill cleanup material is readily stocked and available.</li></ol>	"Weekly"
Contact for more spill cleanup supplies:	"Monthly"
	"As needed"
5. Cleanup equipment such as brooms, dustpans, and spark-proof shovels are available	"Twice a year"
and functional.	
6. Work areas are kept clean. Materials are put away when not in use. Tarps or drip	

Facilit		Cabadula
Facilit	y S DIVIPS	Schedule
	pans are used when conducting work that could lead to spills, drips, or leaks.	
7.	All wastes are disposed of properly. Lids and covers are kept closed on all waste	
	containers when not in use, such as roll-offs and dumpsters. Litter is picked up and	
	removed from the facility.	
	Contact for garbage disposal:	
	Contact for recycling:	
	Contact for metal recycling:	
	Contact for structural BMP maintenance	
	Contact for bazardous waste disposal:	
8.	Paved areas are swept or vacuumed regularly.	
Q	Materials are stored inside, or if stored outside, they are kept elevated and covered if	
9.	they are a netertial source of nellution. This includes meterials that could nuclear an	
	they are a potential source of poliution. This includes materials that could rust of	
	leach chemicals when exposed to stormwater. This applies to roll off dumpsters.	
	Liquids stored outside are stored in secondary containment to catch any potential	
	leaks or spills. The physical integrity of the storage containers is regularly inspected,	
	and damaged containers are replaced as soon as possible.	
10	. The amount of materials stored outdoors is limited. If it is unavoidable, maintain an	
	inventory on what materials are stored outside, where they are located and when	
	they were placed there.	
11	Liquid and material containers are closed and kent closed unless actively in use	
11	. Equid and matchar containers are closed and kept closed diffess actively in use.	
17	User days and universal waste dispesal is available and collection points are	
12	. Hazardous and universal waste disposal is available and collection points are	
	identified and labeled, if appropriate.	
Vehic	e and Equipment Maintenance	
1.	Floor drains that were found to be connected to the stormwater sewer have been	
	eliminated or plugged. If a sump pump has been installed, it is pumped regularly as	
	needed into the sanitary sewer system. A DC Water permit has been obtained.	
2.	Collected wastes are to be properly treated or disposed of by a licensed waste	
	disposal company.	
2	All closning is done at a contralized station so any solvents stay in one area	
5.	All cleaning is done at a centralized station so any solvents stay in one area.	
4.	Parts that are dipped in liquid are removed slowly to avoid drips and spills.	
5.	Drip pans, drain boards, and drying racks are used to direct drips back into a fluid	
	holding tank for reuse or disposal.	
6.	Fluids are drained into appropriate containers for waste disposal or reused prior to	
	disposal.	

Facility's BMPs	Schedule
7. Oil filters are drained, crushed, and recycled with used oil.	
8. Fluids are promptly transferred to the proper container; full drip pans or other ope containers are not left around the shop. Drip pans and containers are emptied and cleaned. Wash water is treated as a waste material and disposed of appropriately.	n
<ol> <li>Leaks, drips, and spills are cleaned up without using water. Absorbents for dry cleanup are used whenever possible. Dry absorbents are collected and disposed of a reasonable amount of time and not left on shop floors.</li> </ol>	in
10. Hosing down is prohibited in any area where the practice would result in the discharge of pollutants to a stormwater sewer system.	
11. Liquid waste is never poured into floor drains, sinks, outdoor storm drain inlets, or other storm drains or sewer connections. Liquid wastes are collected in a properly labeled container, and disposed of by a licensed waste hauler or other appropriate method.	
12. An organized inventory of hazardous materials is maintained and updated regularly	у.
13. The number and amount of hazardous materials has been eliminated or reduced by substituting nonhazardous or less hazardous materials.	у
<ol> <li>Recyclable waste material (e.g., used oil, spent solvents, batteries) is labelled according to Resource Conservation and Recovery Act (RCRA) standards, and the storage and recycling of them tracked.</li> </ol>	
15. Greasy rags, oil filters, air filters, batteries, spent coolant, and degreasers are disposed of in compliance with RCRA regulations.	
16. Manifests of all waste materials hauled away from facility are requested and kept.	
17. All cleaning operations are performed indoors or under cover when possible. Cleaning operations that use water are conducted in an area with a concrete floor with no floor drain other than to sanitary sewers or treatment system. Notable discharges to sanitary sewer systems are done in compliance with rules and policie of DC Water.	s
18. Vehicle maintenance operations that are outside and exposed to stormwater are performed on a concrete pad that is impervious and contained.	
19. Vehicles and equipment waiting to be repaired are parked indoors or under a roof whenever possible. If they are parked outside, drip pans are placed under any activ leaks and the drip pans and vehicles are checked regularly for evidence of new leak and drips. Drip pans that are full or partially full are immediately emptied to avoid overflow, and the accumulated liquids should be properly disposed of, such as drained into the used oil container if there is sheen in it.	ve ks

Facility's BMPs	Schedule
20. Berms, curbs, grassed swales, or other diversion measures are used to ensure that stormwater runoff from other parts of the facility does not flow into the maintenance area.	
21. Maintenance area is inspected regularly to ensure BMPs are implemented and maintained.	
22. Oil/water separator and other filtration devices are inspected regularly and serviced at least twice a year, in according to manufacturer specifications, and as necessary.	
23. Employees are trained on spill response and waste storage and disposal procedures.	
Outdoor Vehicle and Equipment Storage and Parking (Including Dead Vehicle Storage)	
1. Vehicles and equipment are stored indoors or under cover whenever possible.	
2. Storage areas are covered with a roof whenever possible.	
<ol> <li>Rusted vehicles, exposed engines, and transmissions are covered with tarps, canopies, or other types of covers. Covers are inspected regularly to ensure they are properly secured and intact (i.e., no holes).</li> </ol>	
4. Diversion berms, dikes, or grassed swales are placed around the perimeter of the area to limit run-on.	
5. Drip pans are used under all vehicles and equipment waiting for maintenance.	
<ol><li>Spill cleanup materials are readily available and clearly labeled. Spills and leaks are cleaned up immediately.</li></ol>	
7. Dry absorbents are used to clean up spills, drips, and leaks.	
8. Absorbents used in spill cleanup are collected in timely manner and disposed of properly. If it is used to clean up used oil or a toxic chemical, it should be disposed of with used oil or hazardous waste. Contact facility's hazardous waste hauler for specific directions.	
9. Pavement surface is cleaned to remove oil and grease using absorbents, a wet- vacuum or other method that prevents water from entering storm drains. Dirty liquid from a wet-vacuum is disposed of into a sanitary sewer or with used oil or hazardous waste, depending on the contents; it should never be poured down a storm drain.	
10. Media filters such as catch basin and sand filters are installed and maintained.	
11. Parking area is regularly swept to minimize debris on the ground.	

Facility's BMPs		Schedule
12	. Storage area is inspected regularly for full drip pans, and to ensure BMPs are being	
	maintained and implemented.	
13	. Employees are trained on procedures for storage, spill response, and inspection.	
Vehicl	e Washing	
1.	Washing parts or equipment outside is avoided.	
2.	Vehicles are washed at permanent wash stations that divert wash water to the sanitary sewer, or a temporary wash station is set up that does.	
3.	Activities are confined to designated areas away from outdoor storage and maintenance areas, outside stormwater drainage pathways, and away from surface waters.	
4.	When washing outdoors, the cleaning operation is covered over and all wash water drains to the intended collection system.	
5.	Phosphate-free biodegradable detergents are used.	
6.	Washing wands and nozzles have levers that automatically shut off water to minimize water use.	
7.	Wash water is contained and diverted to the sanitary sewer or other treatment system. If wash water cannot be diverted, it is collected from the cleaning area, and provided treatment or recycled.	
8.	Cleaning area is inspected regularly to ensure BMPs are implemented and maintained.	
9.	Employees are trained on proper vehicle washing procedures.	
Fuelin	g	
1.	Fueling operations are conducted (including the transfer of fuel from tank trucks) on an impervious or contained pad or under a roof or canopy where possible. All covering is extended beyond spill containment pad to prevent rain from entering.	
2.	The facility implements a current Spill Prevention, Control, and Countermeasure (SPCC) Plan in accordance with the Clean Water and Oil Pollution Acts (40 CFR 112).	
3.	Fueling area is located on a concrete pad (not asphalt, which is not chemically resistant to the fuels being handled).	
4.	Drip pans are placed under active leaks or spills and underneath vehicles and equipment when making and breaking hose connections.	

Facility's BMDs		Schodulo	
		Schedule	
5.	Fueling hoses with check valves are used to prevent hose drainage after filling.		
6.	Spill cleanup materials are readily available and clearly labeled. Spills and leaks are cleaned up immediately. Hazardous waste container is available for disposal of used absorbents.		
7.	Runoff from fueling areas is minimized/eliminated with diversion dikes, berms, curbing, surface grading, or other equivalent measures.		
8.	Dry cleanup methods for fuel areas are used rather than hosing down the fuel area.		
9.	Preventive maintenance on storage tanks is performed to detect potential leaks before they occur. The storage tanks have automatic alarms to notify staff of leaks/spills.		
10	All applicable federal and local regulations are observed with underground storage tanks. These include what is listed on <u>https://doee.dc.gov/service/underground-storage-tank-program</u>		
11.	Aboveground storage tanks are double walled and/or placed in a secondary containment berm in accordance with the site's SPCC plan. The secondary containment is regularly inspected to ensure the tank is not leaking.		
12.	The fueling area is regularly inspected for evidence of leaks and spills.		
13	Curbing or posts around fuel pumps are in place to prevent collisions during vehicle ingress and egress.		
14.	"Topping off" of fuel tanks is discouraged.		
15	Emergency shut-off valve is clearly labeled and easily accessible.		
16	Personnel are trained on vehicle fueling BMPs.		
Mohile	o fueling areas also include:		
17	Drip pans are used under the transfer hose.		
18	Fueling vehicles are equipped with a manual shutoff valve.		
Loadin	g and Unloading Materials		
1.	Loading/unloading activities are confined to designated areas outside drainage pathways and away from surface waters.		
2.	Diversion berms, dikes, or grassed swales are provided around the perimeter of the area to limit run-on.		

Facility's BMPs		Schedule
3.	Materials are not loaded or unloaded in the rain, if possible, to prevent exposure to stormwater.	
4.	Loading and unloading is performed on an impervious pad with overhangs to allow for easy containment and collection of spilled materials.	
5.	Impervious concrete floor is sloped to collect spills and leaks and convey them to proper containment and treatment.	
6. 3	Spill prevention, containment, and countermeasure (SPCC) plans are developed and implemented, where required.	
7.	Employees are trained in spill prevention, control, cleanup, and transfer techniques.	
Hazardo 1.	<b>Dus Materials Loading/Unloading:</b> Loading and unloading are only done in designated area. This designated area is 	
2.	When loading and unloading, absorbent rolls, berms, or plastic sheeting are placed over nearby storm drains to prevent spills from entering the drain.	
3. /	Areas are frequently swept where materials are loaded/unloaded to remove pollutants.	
4.	A spill kit with appropriate absorbent materials is kept nearby during loading/unloading.	
Facility	and Landscape Maintenance	
0		
1.	I: The site is graded to ensure it drains properly and that storage and parking areas do not flood. The site is regraded when necessary.	
2.	Parking, driveways, and sidewalks are regularly swept to keep sediment, leaves, debris, and litter out of the storm drains.	
3. /	Areas are not hosed down to clean them; all non-stormwater is prevented from entering storm drains.	
4.	Potholes are repaved or patched.	
Cold W	eather Activities:	
1.	The use of salt and abrasives for ice removal is minimized. Anti- and deicers are applied according to the manufacturing recommendations stated on packaging.	
2	All salt is stored where it is protected from being exposed to stormwater in a covered	

Facility's BMPs		Schedule
	area and elevated off the ground or inside.	
3.	Train employees on salt and abrasives application methods and rates.	
Landso	cape maintenance:	
1.	Yard waste is disposed of properly. It is not disposed of in ditches or in locations where it can enter storm drains or waterways.	
2.	Landscaping equipment is never filled or refueled directly adjacent to or upstream of a storm drain.	
3.	Piles of dirt are kept covered with a tarp until used or removed.	
4.	Irrigation system is regularly inspected and maintained to ensure it is not watering hard surfaces, such as sidewalks, driveways, and roads, and to ensure it is not overwatering. Irrigation water is prevented from running off the site.	
Erosio	n and Sediment Control:	
1.	Run-on from adjacent properties is minimized using diversion dikes, berms, or equivalent.	
2.	Sediment at downgradient locations and outlets serving unstabilized areas is trapped. This includes filter fabric fences, gravel outlet protection, sediment traps, vegetated or riprap swales, vegetated strips, diversion structures, catch-basin filters, and retention/detention basins or equivalent.	
3.	Digging, tilling, or otherwise disturbing soils is avoided unless there are plans to stabilize the area, prevent erosion and or stop/slow stormwater runoff immediately afterward.	
4.	Soil erosion is prevented by stabilizing areas with exposed dirt. This will be done by planting the areas, covering areas with natural materials (gravel, mulch, etc.), installing mulch matting, or through other stabilization methods.	
5.	All high-traffic areas are stabilized, including all vehicle entrances and exit points. Conduct periodic sweeping of all traffic areas. Inspections are conducted of erosion control BMPs.	
6.	Green Infrastructure BMPs are inspected regularly and receive necessary maintenance.	
7.	Employees are trained on the proper installation and maintenance of erosion and sediment controls.	
8.	Prior to land disturbance or re-disturbance of an area greater than 50 square feet, the facility will adhere to DOEE's Soil Erosion and Sediment Control regulations and submit a plan for review. These include what is listed on <u>https://doee.dc.gov/esc</u> .	

Facility	Facility's BMPs		
Applic	ation of Fertilizers and Pesticides:		
1.	All applicable Federal and local regulations are observed when using fertilizers and		
	pesticides. DOEE's Integrated Pest Management plan is followed, and all employees		
	applying pesticides and herbicides have a current District Pesticide License. These		
	include		
	<ul> <li>District Fertilizer Law: <u>doee.dc.gov/fertilizer</u></li> </ul>		
	<ul> <li>Pesticide application, registration, and notification laws:</li> </ul>		
	doee.dc.gov/service/pesticides		
2.	Application does not occur on or near any waterbody unless the chemical is		
	specifically designed for surface waters.		
3.	Recommended application rates and methods are strictly followed (i.e., do not apply		
	in excess of vegetative requirements). Manufacturer's recommendations written on		
	packaging are used when available.		
4.	Safety Data Sheets for the products are collected and kept on-site.		
5.	Materials such as absorbent pads are easily accessible to clean up spills.		
-			
6.	All containers are inspected and maintained to prevent leaking.		
-	Anneliante a suring set is calibrated and called and stand we do not an		
7.	Applicator equipment is calibrated annually and stored under cover.		
o	A training program on proper application methods and spill provention for		
0.	a training program on proper application methods and spin prevention for		
	employees is conducted.		
9.	Drums and containers are stored indoors when possible.		
Tracking of sediment and other pollutants:			
1. Wheels and exterior of trucks or other equipment are cleaned as necessary to			
	minimize waste tracking while containing any wash waters. (See section "Vehicle		
	Washing" on p. 19).		
2.	Established procedures are used, such as rumble strips and gravel apron, to minimize		
	off-site tracking.		
3.	Parking areas and driveways are regularly swept to keep sediment, leaves, debris,		
	and litter out of the storm drains.		
4.	Spills and leaks are contained and cleaned up immediately to prevent tracking		
	throughout and off site.		
Outdo	Outdoor Storage		
Portab	le containers/drums:		

Facility's BMPs		Schedule
2.	Drums, including empty or used drums, are stored in secondary containment with a roof or cover (including temporary cover such as a tarp or cap that prevents contact with precipitation).	
3.	Secondary containment, such as dikes or portable containers, is provided, with a height sufficient to contain a spill (whichever is greater: 10 percent of the total enclosed tank volume or 110 percent of the volume contained in the largest tank).	
4.	Drums are clearly labelled with their contents.	
5.	Integrity of all containers is inspected regularly and again before loading and unloading. Material is transferred to a new container/drum if a structural defect is found in the existing container, such as a dent, a crack, or rust.	
6.	An inventory of materials stored outside is kept and updated, and the amount of materials stored outside is minimized.	
7.	Employees are trained on proper procedures to fill and transfer materials to new containers/drums.	
Stockr	piles of materials, such as sand, mulch, aggregate, and gravel:	
1.	Materials are stored in in a silo or building.	
2.	Material storage piles are covered with a tarp or awning.	
3.	Tarps are regularly inspected to ensure they are intact and being used and secured properly.	
4.	Storage is confined to designated and labeled areas outside of drainage pathways and away from surface waters.	
5.	Good stockpiling practices are used such as storing materials on concrete or asphalt pads; surrounding stockpiles with diversion dikes, curbs, or bunkers/stalls to limit run-on and to slow runoff; and covering with a tarp.	
6.	Sediment basins, silt fence, vegetated filter strips, or other sediment removal measures are installed downstream/downslope.	
Scrap 1.	material storage including bulk solid materials: Storage in a roll-off dumpster is covered with a tarp when not in use.	
2.	Non-recyclable waste storage bins and containers are provided and kept closed.	
3.	Runoff is minimized from entering into areas where significant materials are stored (e.g., diversion structures such as curbing, berms, containment trenches, surface grading, elevated concrete pads, etc.) or other equivalent measure.	

Facilit	y's BMPs	Schedule
4.	Media filters such as catch basin and sand filters are installed and maintained.	
5.	Periodic inspections are conducted. Preventative maintenance is conducted as necessary.	
6.	Equipment operators are trained to minimize damage to stormwater controls (e.g., curbing and berms).	
Above	ground tanks:	
1.	Secondary containment, such as dikes, with a height sufficient to contain a spill is provided (whichever is greater: 10 percent of the total enclosed tank volume or 110 percent of the volume contained in the largest tank).	
2.	If containment structures have drains, it is ensured that the drains have valves, and that valves are maintained in the closed position. Protocols are instituted for checking/testing stormwater in containment areas prior to discharge.	
3.	Double-walled tanks with overflow protection are used.	
4.	Liquid transfer nozzles/hoses are kept in a secondary containment area.	
5.	The area is uncovered and the tanks' sump outlet is connected to the sanitary sewer (if possible) or an oil/water separator, catch basin filter, etc. If connected to a sanitary sewer check with DC Water to ensure that the discharge is acceptable. When implementing separator or filter technologies, regular inspections and maintenance procedures are conducted.	
6.	Spill plans are developed and implemented.	
7.	Spill supplies are stocked, clearly labeled, and readily available.	
8.	Employees are trained in spill prevention and control.	
Painti	ng	
1.	Painting activities are enclosed, covered, or contained in designated areas to the maximum extent practicable to prevent overspray from reaching surface waters.	
2.	Air quality permits are obtained prior to painting, when necessary.	
3.	Plastic barriers or tarps are hung during blasting or painting operations to contain debris.	
4.	Uncontained spray painting activities are prohibited.	
5.	Painting activities are prohibited during windy conditions that render containment ineffective.	

Facilit	y's BMPs	Schedule
6.	Spray equipment that delivers more paint to the target is used, and in turn has less overspray.	
7.	Paints and solvents are mixed in designated areas away from drains, ditches, piers, and surface waters, preferably indoors or under cover.	
8.	Absorbent and other cleanup items are readily available and clearly labeled for immediate cleanup of spills, drips, and leaks.	
9.	Empty paint cans are allowed to dry before disposal.	
10	. Paint and paint thinner are stored away from high-traffic areas to avoid spills.	
11	. Paint, paint thinner, and solvents are recycled.	
12	. Effective inventory controls are implemented to reduce paint waste, including tracking date received and expiration dates. Expired paints and solvents are disposed of or recycled. When relevant, paints and solvents should be disposed of in accordance with RCRA requirements.	
13	. Waste paint, solvents, and rags are stored in covered containers to prevent evaporation.	
14	Solvents with low volatility and coatings with low volatile organic compound (VOC) content are used; high transfer efficiency coating techniques are used such as brushing and rolling to reduce overspray and solvent emissions.	
15	. Paint brushes, rollers, and other equipment are washed in utility sinks or other locations where wash water goes to the sanitary sewer, is treated, or is hauled to an off-site treatment facility. Do not wash equipment outside on pavement or into storm drains.	
16	. Painting procedures are inspected to ensure that they are conducted properly.	
17	. Employees are trained on proper sanding, painting, and spraying techniques.	
Snow	and Ice Removal Operations	
1.	Salt is kept in a salt dome or under cover and protected from runoff that can leach salt from underneath a pile.	
2.	Salt stored at the salt dome is kept four feet back from the entrances and trench drains are kept clear of salt and cleaned out regularly.	
3.	The secondary containment berm surrounding the brine tanks is emptied when it becomes 50 percent full, and wastewater is reused or disposed of properly. If there is	

Facility's BMPs		Schedule
	evidence that there is anything other than stormwater within the berm, wastewater will be disposed in the sanitary sewer or wastewater will be tested and disposed of properly by a contractor.	
4.	Keep the valve used to empty brine tanks secondary containment in the closed position. Label which position is closed and which is open, if necessary.	
5.	Salt dome and brine tanks are regularly inspected. This includes entrances of salt dome for evidence of overflow and track out of salt, dome's structural integrity, and the brine tanks' secondary containment for fullness level and integrity.	
6.	Spills are promptly cleaned up of salt and brine using dry cleanup methods.	
7.	Equipment and vehicles used to move and apply salt are washed regularly throughout the snow season to remove salt while containing any wash waters. (See section "Vehicle Washing" on p. 19).	
8.	Salt dome and snowplow operators are trained on proper salt and brine handling, how to properly dispose of excess or spilled salt, spill response, and good housekeeping before snow season.	
Hazar	dous Material Storage	
1.	Store hazardous materials in designated areas only.	
2.	Store hazardous materials indoors or in a covered area to properly protect hazardous materials from stormwater.	
3.	Hazardous materials are stored according to the manufacturer by installing concrete or non-absorbing berms around each specific hazardous material to avoid mixing wastes.	
4.	Sufficient aisle space is left between hazardous material containers to ensure ease of inspection and handling.	
5.	Hazardous materials are stored away from high-traffic areas and protected by traffic control measures, such as bollards, if necessary.	
6.	Safety data sheets for all hazardous materials are collected and kept on-site.	
7.	An inventory of all hazardous materials is stored on-site, is updated regularly, and indicates storage locations.	
8.	A spill kit is kept near the storage area and is stocked with absorbents appropriate for cleaning and containing spills from the hazardous material stored there.	
9.	Hazardous materials are kept in original containers. The containers have information	

Facility's BMPs	Schedule
on how to properly store and dispose of materials, so having the containers makes this information more easily available.	
10. Inspections of storage areas are conducted according to a schedule that allows for the detection of problems before they occur.	
11. Prior to placing containers in hazardous materials storage areas, all containers are inspected for integrity (structurally sound, can close tightly, and no dents or rust), labelling, and proper placement. Hazardous materials are transferred to a new container if integrity of existing container is compromised.	
12. Hazardous material, stored in areas that could be exposed to stormwater runoff, are elevated off the ground using spill pallets or other methods.	
13. Dry cleanup methods are used to clean hazardous material storage areas instead of using water to wash them.	
14. Employees are trained on proper storage techniques.	
Structural BMPs	
List structural BMPs at the facility, any required maintenance requirements listed in the site's stormwater management plan and/or the manufacturer's recommended maintenance plan or general maintenance requirements found in the Stormwater Guidebook ( <u>https://doee.dc.gov/node/610572</u> )	
Additional Activities not listed	
Add any additional activities or BMPs that are site specific to the facility.	

# 3.2 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.



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: [Enter contact name] Email: [Enter contact email] Phone: [Enter 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: [Enter contact name] Email: [Enter contact email] Phone: [Enter contact phone]

3. *Department of Energy and Environment:* Provide DOEE with a written release report within 5 days of an event.

Address: Department of Energy and Environment

c/o Branch Chief, Illicit Discharge and NPDES Branch
1200 First Street NE, 5th floor
Washington, DC 20002
Or Call: 202-535-2600, Monday to Friday, 9am to 5pm

## 3.2.1. Spill and leak response procedures:

Use the flow chart in Figure 1 when a spill or leak is detected for instructions on how to respond.

Space Intentionally Blank

Figure 1. Flow chart for spill and leak response. Start at box 1.



**†Reportable Quantities** are where a leak/spill/other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either <u>40 CFR Part 110</u> (oil), <u>40 CFR Part 117</u> (hazmat), or <u>40 CFR Part 302</u> (hazmat), occurs during a 24-hour period.

## 3.2.2. Steps for cleaning up small spills/leaks:

The following procedures are used to respond to small spills and leaks.

- **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 [ENTER name] if supplies in the spill response kit are running low
- Step 4: Dispose of used absorbents. Sweep up the used loose absorbents using a non-spark shovel, broom, and/or dustpan. All absorbent materials (loose or pads) should be disposed of properly in a hazardous waste disposal bin, as they may be flammable.
- 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 Appendix H.

## III. 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
- o Source and cause of the release or spill
- o Medium (e.g., land, water) affected by release or spill
- o 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
  - o Whether an evacuation has occurred
  - Other agencies notified or about to be notified
  - o Any other information that may help emergency personnel respond to the incident

## IV. 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, Illicit Discharge and NPDES Branch (MS4 Areas) (202) 535-2600
- 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: <u>http://geospatial.dcgis.dc.gov/watershedfinder</u>
- 2. Leaking sewer line or water main: DC Water (202) 612-3400
- 3. Illegal dumping of solid waste: call 311, visit <u>311.dc.gov</u>, or use the DC 311 smartphone app.

Fill out the appropriate sections of the table below to provide clear guidance on: i) what reporting is needed, ii) the time frame for reporting, and iii) who is responsible for reporting.

Procedure	Frequency	<u>Responsible</u> Party	Associated Records
Routine facility inspections	Choose: Quarterly/Monthly	<u></u>	Routine Inspection Form
Quarterly visual assessment <b>(MSGP Only)</b>	Once a quarter: • January 1 – March 31 • April 1 – June 30 • July 1 – September 30 • October 1 – December 31 (at least one must be snow melt if possible)		Quarterly Visual Assessment Form (Attachment E)
Analytical monitoring: As required by the EPA or NPDES permit (MSGP Only)	As required by the EPA or NPDES permit		As required by the EPA or NPDES permit (Fill in once it is determined what permit requirements are)
Annual report (MSGP Only)	by January 30 for each year of permit coverage		Annual Report Form requires facility to use the NPDES eReporting Tool, or "NeT",
If facility discharges into the MS4, facility must report noncompliance to DOEE	<ul> <li>24-hour oral reporting</li> <li>5-day follow-up written report</li> </ul>		The written report must contain a description, time frame, and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. This report will be sent to DOEE's Branch Chief; Illicit Discharge and NPDES Branch <u>https://doee.dc.gov/page/natural- resources-administration</u>
Procedural and administrative changes to the SWPPP (e.g., name changes, changes in the description of potential pollution sources, modifications to a BMP)	Annually		Updated and dated SWPPP SWPPP Modification Log (Attachment F)
Employee training on SWPPP	Annually		Training log sheet with attendee names (Attachment G)

## Table 9. Reporting Requirements

## 4.1 Inspections

## 4.1.1. Routine Facility Inspections (MSGP and Non-MSGP):

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

These inspections are conducted \_\_\_\_\_\_ (*Choose either quarterly/monthly*) using the "Routine Inspection Form" found in Attachment D.

#### 4.1.2. Quarterly Visual Assessment of Stormwater Discharges (MSGP):

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**. 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.
- 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 Form" found in Attachment E.

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			

Whenever the visual assessment shows evidence of stormwater pollution, corrective action procedures are initiated as per the Corrective Actions Section 4.4.

These samples are not required to be collected consistent with 40 CFR Part 136 procedures but must be collected in such a manner that the samples are representative of the stormwater discharge. Guidance on monitoring is available at <a href="https://www.epa.gov/npdes/industrial-stormwater-guidance">https://www.epa.gov/npdes/industrial-stormwater-guidance</a>

# 4.2 Analytical Monitoring (MSGP):

Analytical monitoring is required only for the MSGP industry sectors or sub-sectors which were determined to have a high potential to discharge a pollutant at concentrations of concern. To determine what sectors need this monitoring and how to conduct (and what to include in this SWPPP), refer to Appendix F.

## 4.2.1. Benchmark monitoring:

UNO: Due to the activities on site, the facility is not subject to benchmark monitoring at this time.

YES: Due to the activities on site, the facility is subject to benchmark monitoring. The requirements for this monitoring are: <u>Enter requirements</u>

## 4.2.2. Effluent limitations guidelines monitoring:

 $\Box$ NO: Due to the activities on site, the facility is not subject to effluent limitation monitoring at this time.

 YES: Due to the activities on site, the facility is subject to effluent limitation monitoring.

 The requirements for this monitoring are:

 Enter requirements

#### 4.2.3. State-specific monitoring:

The District does not have any additional monitoring requirements at this time.

## 4.2.4. Impaired waters monitoring:

 $\Box$ NO: The facility is not subject to impaired water monitoring at this time.

 YES: Due to the activities on site, the facility is subject to impaired waters monitoring.

 The requirements for this monitoring are:

 Enter requirements

## 4.2.5. Other monitoring as required by EPA:

 $\square$ NO: The facility is not subject to additional monitoring at this time.

 YES: Due to the activities on site, the facility is subject to additional EPA required monitoring.

 The requirements for this monitoring are:

 <u>Enter requirements</u>

# 4.3 Annual Report (MSGP):

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 (NeT). To access NeT, go to <a href="https://www.epa.gov/compliance/npdes-ereporting">https://www.epa.gov/compliance/npdes-ereporting</a>.

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 action documentation
- Any incidents of noncompliance in the past year or currently ongoing, or if none, a statement that facility is in compliance with the permit.

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

For the MSGP, the facility needs to identify if it will affect Endangered Species, Historic properties and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites. Instructions and further information to determine these are listed in Appendices G and H.

## 4.4.1. Endangered Species:

Instructions to determine are found in the Appendix G.

NO: No federally listed threatened or endangered species or their critical habitats are likely to occur in the action area.

 $\Box$ 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.

#### 4.4.2. Historic Properties:

#### Instructions to determine are found in the Appendix H.

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). A: The facility will not be constructing and/or installing stormwater control measures that involve subsurface disturbance, so there will be no impact to the historic property.

 $\square$ *B*: The facility will be constructing and/or installing stormwater control measures that involve subsurface disturbance, so there may be impact to the historic property. A letter was sent to the HPO and the following control measures were given to limit the impact to the historic property:

List control measures here: \_\_\_\_\_\_

## 4.4.3. Federal CERCLA:

Currently, the only listed federal CERCLA site in the District is the Washington Navy Yard. To ensure that this hasn't changed and the facility is not a CERCLA site, search at: <a href="https://cumulis.epa.gov/supercpad/CurSites/srchsites.cfm">https://cumulis.epa.gov/supercpad/CurSites/srchsites.cfm</a>

**NO**: The facility is not a Federal CERCLA site.

## 4.5 Corrective Actions:

When a current or potential discharge of stormwater pollution is identified, action is immediately taken to remedy the problem. It is called taking corrective action because it gets the facility back on track with stormwater pollution prevention.



Corrective actions include the following:

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

There are three steps for taking corrective action:

- 1) Immediate actions,
- 2) Subsequent actions, and
- 3) Documentation.

Each has specific deadlines and requirements outlined below:

**The following deadlines are not optional!** They are required by the 2015 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.

#### Step 1. Immediate Actions

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, unless:

The condition is identified too late in the workday to start or complete the corrective action. If so, the corrective action must begin no later than the following workday.

The SWPPT is notified of the corrective action.

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.

#### Step 2. Subsequent Actions (MSGP)

If the SWPPT decides that additional actions are needed, these actions are completed within one of the following time frames:

- 1. Before the next storm event, if possible, and/or within 14 calendar days
- 2. Unable to complete the subsequent 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 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. 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 in Section 7, Step 3

EPA Region 3 contact information: Address: U.S. EPA Region III Office of NPDES Permits and Enforcement NPDES Permits Branch, Mail Code 3WP41 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 (Section 3), 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 Appendix F.

#### **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 Appendix H.

- 1. Date the condition was identified.
- 2. What caused the condition? Describe what triggered the need for corrective action.
- 3. 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 cleanup was completed, when notifications were made, and which staff were involved. Include any measures taken to prevent the reoccurrence of such releases.
- 4. **Signed and certified statement.** A signed and certified statement verifying that the information that is documented is correct is required. This should be kept with the corrective action documentation. The statement should be signed following the requirements in Section 9.

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.
## 4.6 SWPPP Modifications:

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

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.

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

**How to update:** There is a variety of ways to update this SWPPP. Whichever method is used, the updates need to be tracked in an SWPPP amendment log in Attachment F of this SWPPP. Ways to update include:

- 1. Enter information into an existing table in the SWPPP
- 2. Manually edit information in the SWPPP (electronically or on the paper version)
- 3. Include information as an appendix
- 4. Document and track amendments made throughout the year and update the annual document update. The SWPPP modification log in Attachment F should be used in this step

## SECTION 5: SWPPP CERTIFICATION

This section is a signatory certifying the SWPPP. Who should sign the 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.

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:

## **SWPPP ATTACHMENTS:**

- A. General Location Map
- B. Site Map
- C. DOEE Stormwater Approved Plan/Structural BMPs Manuals
- D. Routine Inspection Form
- E. Quarterly Visual Assessment Form (MSGP)
- F. <u>SWPPP Modification Log</u>
- G. Training Log Sheets
- H. Corrective Actions
- I. Copy of 2015 MSGP (MSGP)

# Attachment D: Routine Inspection Form (Template)

General Infor	mation			
Date of Inspe	ction		Start/End Tir	ne
Inspector's Na	Inspector's Name(s)			
Inspector's Co	ontact Information			
Weather Info	rmation			
Weather at th	ne time of inspection	Ten	nperature:	
Clear L	Cloudy 🔲 Rain 🛄 Sleet 🛄 Fog 🛄 Snow 🛄 High Wi	inds 🗳 Other:		
Have any prev	viously unauthorized discharges of pollutants occurred since t	the last inspection?	Yes 🛛 No	
If yes, describ	e:			
Are there any If yes, describ	<pre>discharges occurring at the time of inspection? UYes UNo e:</pre>			
Areas of M	aterials or Activities Exposed to Stormwater			
Using the S	ite Map, use the corresponding area ( <mark>Break down the facility ir</mark>	nto areas)		
Area	Controls Measures	Actions Needed/Act	ions Taken /Notes	Photo
(Area 1)	Leaks/Spills? 🛛 Yes 🖾 No 🖵 N/A			
	Trash? UYes UNO UN/A			
	Materials elevated/covered/labeled DYes DNo DN/A			
	Unauthorized discharges $\Box$ Yes $\Box$ No $\Box$ N/A			
		□ Issues Resolved, D	ate:	
State	Sediment Chemicals			
Structural	Trash Structural changes			
BMP and				
repeat for				
the area.		Issues Resolved, D	ate:	
(Area 2)	Leaks/Spills? 🛛 Yes 🖾 No 🖵 N/A			
	Trash? 🛛 Yes 🖾 No 🖵 N/A			
	Tracking/Sediment?   Yes  No  N/A			
	Materials elevated/covered/labeled			
	Unauthorized discharges LiYes LiNo Li N/A	Lissues Pasalvad, D	ato	
State	Sediment Chemicals		ate	
Structural	Trash Structural changes			
BMP and				
repeat for				
each one in				
the area.		Issues Resolved, D	ate:	
(Area 3)	Leaks/Spills? UYes UNO U N/A			
	Tracking/Sediment? $\Box$ Yes $\Box$ No $\Box$ N/A			
	Materials elevated/covered/labeled  Yes  No  N/A			
	Unauthorized discharges TYes INO IN/A			
		Issues Resolved, D	ate:	

Area	Controls Measures		Actions Needed/Actions Taken /Notes	Photo
State Structural	<ul><li>Sediment</li><li>Trash</li></ul>	<ul><li>Chemicals</li><li>Structural changes</li></ul>		
BMP and repeat for				
the area.			Issues Resolved, Date:	
(Area 4)	Leaks/ Spills?  Yes Trash?  Yes  No Tracking/Sediment? Materials elevated/co Unauthorized discharg	]No 🗆 N/A   N/A ]Yes 🗆 No 🖵 N/A vered/labeled 🗬 Yes 💷 No 🗔 N/A ges 🗬 Yes 💷 No 🗔 N/A		
State	□ Sediment		☐ Issues Resolved, Date:	
Structural BMP and repeat for each one in the area.	Trash	Structural changes		
			Issues Resolved, Date:	

Use this space for any additional notes or observations from the inspection:

#### Deviations from routine inspections should be documented below.

Date: Describe deviation from schedule:

Reason for deviation:

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.

#### Print name and title: \_\_\_\_\_\_

Signature: Date:

# Attachment E: Quarterly Visual Assessment Form (MSGP)

MSGP Quarterly Visu	ial Assessment Form
(Complete a separate form	n for each outfall assessed)
Name of Facility: Name of Facility	PDES Tracking No. Insert Tracking No.
Outfall Name: Name "Substantially Identical Outfall"?	Yes (identify substantially identical outfalls):
Person(s)/Title(s) collecting sample: Name/Title	
Person(s)/Title(s) examining sample: Name/Title	
Date and Time Discharge Began:Date and Time SampleEnter date and timeEnter date and time	Collected: Date and Time Sample Examined: Enter date and time
Substitute Sample? No Yes (identify quarter/year when sample	was originally scheduled to be collected):
Nature of Discharge: Rainfall Snowmelt	
inches inches Before Start of This Storm?	
Para	meter
Color None Other (describe):	
Odor None Musty Sewage Sulfur Sour Solvents Other (describe):	Petroleum/Gas
Clarity Clear Slightly Cloudy Cloudy Opaque	Other
Floating Solids No Yes (describe):	
Settled Solids** No Yes (describe):	
Suspended Solids 🗌 No 🗌 Yes (describe):	
Foam (gently shake sample)  No Yes (describe):	
Oil Sheen None Flecks Globs Sheen Slick	
Other Obvious Indicators No Yes (describe): of Stormwater Pollution	
* The 72-hour interval can be waived when the previous storm did not yield a meas that less than a 72-hour interval is representative of local storm events during the s	surable discharge or if you are able to document (attach applicable documentation) ampling period.
** Observe for settled solids after allowing the sample to sit for approximately one-	half hour.
Detail any concerns, additional comments, descriptions of pictures ta sheets as necessary). Insert details	iken, and any corrective actions taken below (attach additional
Certification by Facility Responsible Official (Refer to MSGP Subpart 11 Apple I certify under penalty of law that this document and all attachments were prepared that qualified personnel properly gathered and evaluated the information submitted persons directly responsible for gathering the information, the information submitted aware that there are significant penalties for submitting false information, including	endix B for Signatory Requirements) I under my direction or supervision in accordance with a system designed to assure . Based on my inquiry of the person or persons who manage the system, or those d is, to the best of my knowledge and belief, true, accurate, and complete. I am the possibility of fine and imprisonment for knowing violations.
A. Name:	B. Title:
C. Signature:	D. Date Signed:

# Attachment F: SWPPP Modification Log (Template)

Amend. No.	Description of the Amendment	SWPPP Section	Date of Amendment	Amendment Prepared by [Name(s) and Title]
1	Insert description of amendment		Insert date	Insert name/title
2	Insert description of amendment		Insert date	Insert name/title
3	Insert description of amendment		Insert date	Insert name/title
4	Insert description of amendment		Insert date	Insert name/title
5	Insert description of amendment		Insert date	Insert name/title
6	Insert description of amendment		Insert date	Insert name/title
7	Insert description of amendment		Insert date	Insert name/title
8	Insert description of amendment		Insert date	Insert name/title
9	Insert description of amendment		Insert date	Insert name/title
10	Insert description of amendment		Insert date	Insert name/title
11	Insert description of amendment		Insert date	Insert name/title

# Attachment G: Training Log Sheets (Template)

Training Date: Insert Date of Training			
Training Description: Insert Description of Training			
Trainer: Insert Trainer(s) names			
Employee(s) trained	Employee signature		
Insert Name			

Training Date: Insert Date of Training			
Training Description: Insert Description of Training			
Trainer: Insert Trainer(s) names			
Employee(s) trained	Employee signature		
Insert Name			

Training Date: Insert Date of Training			
Training Description: Insert Description of Training			
Trainer: Insert Trainer(s) names			
Employee(s) trained	Employee signature		
Insert Name			
Training Description: Insert Description of T Trainer: Insert Trainer(s) names Employee(s) trained Insert Name Insert Name Insert Name Insert Name Insert Name Insert Name Insert Name	Employee signature		

# Attachment H: Corrective Action Form (Template)

Name:	Contact information:
Date/Time:	
Reason for action:	□ Other
Description of Incident:	
Material:	Amount:
Location:	
Cause of incident:	
Did it discharge to the Waters of the U.S? $\Box$ Yes $\Box$ N	Νο
Date condition was identified:	
Immediate actions taken:	
Actions that will be taken within 14 days:	
14-Day infeasibility? Yes No, Why?	

## Attachment I: Copy of 2015 MSGP

United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). June 4, 2015.

Final 2015 MSGP documents can be found at https://www.epa.gov/npdes/final-2015-msgp-documents

## **SWPPP Template Appendices:**

- A. MSGP Determination References (MSGP)
- B. Impaired Waters (MSGP)
- C. Sector-Specific Requirements for Industrial Activities (MSGP)
- D. Outfall Definition
- E. Structural BMPs
- F. Analytical Monitoring (MSGP)
- G. Endangered Species Determination (MSGP)
- H. Procedures Relating to Historic Properties Preservation (MSGP)
- I. Unauthorized Non-Stormwater Discharges and MSGP Documentation (MSGP)

## Appendix A: MSGP determination references

## Understanding if a facility is "Industrial"

An industrial facility is defined by the EPA as a facility that has any industrial activities taking place on site, whether or not the industrial activity is the facility's primary activity. Industrial activities are defined in the MSGP by their Occupational Safety and Health Administration (OSHA) Standard Industrial Classification code (<u>SIC Code</u>). It is recommended you carefully examine the industrial activities outlined in Appendix D of the <u>MSGP</u> or the more detailed list found in Appendix N, because some activities are not obviously "industrial."

Example: Automotive service shops in the MS4 or direct drainage areas of the District are considered industrial if they service passenger transportation vehicles, such as taxis and tour buses. These industrial shops are required to obtain a federal stormwater permit (e.g., MSGP). If the shop only services privately owned vehicles it instead falls into the service industry, which is not considered industrial, and therefore a federal stormwater permit is not needed.

# *MSGP listed Industrial Activities:* <u>https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_appendixn.pdf</u>

Common industrial activities found at municipal facilities:

Activity Types	Sector	SIC Codes
Land Transportation and Warehousing		
<ul> <li>Local and suburban transit, including bus and rail</li> </ul>		
School buses		1011 - 1021
• Fleet repair facilities	P1	4011 - 4231,
<ul> <li>Local trucking, including general freight and solid waste collection</li> </ul>		4311, 5171
<ul> <li>Warehousing, including automobile dead storage</li> </ul>		
<ul> <li>Petroleum bulk stations and terminals</li> </ul>		
Asphalt Paving and Roofing Materials and Lubricants	D1	2951, 2952
Hazardous Waste Treatment, Storage, or Disposal		HZ
Automobile Salvage		5015
Scrap Recycling		5093
Water Transportation	Q1	4412 - 4499
Treatment Works	Т	TW

## Appendix B: Impaired Waters

Step One:

Look up the facility's discharge waters (watershed) at:

https://dcgis.maps.arcgis.com/apps/InformationLookup/index.html?appid=a60a0086b47c4e35a638b7a8abe5 954f

- Type in address of the facility and look at the information for the location.

Identify Your Watershed and Sewer System



Figure 1. Screen image when searching under facility address

## Step Two:

# Determine if there are impaired waters in your watershed at <a href="https://ofmpub.epa.gov/waters10/attains\_state.control?p\_state=DC">https://ofmpub.epa.gov/waters10/attains\_state.control?p\_state=DC</a>

Use the subshed and watershed that the facility is in to determine if the facility discharges into impaired waters and if there are TMDLs listed



Figure 2. Screen image when searching under "Hickey Run"

#### TMDLs That Apply to this waterbody

Description of this table				
TMDL Document Name	TMDL Date	TMDL Pollutant Description	TMDL Pollutant Source Type	Cause(s) of Impairment Addressed
Hickey Run	Sep-01-1999	Oil and Grease	Point/Nonpoint Source	Oil and Grease
Hickey Run	Aug-28-2003	Pathogens	Point/Nonpoint Source	Fecal Coliform; Cause Unknown
Hickey Run	Aug-29-2003	DDT	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)
Hickey Run	Aug-29-2003	Chlordane	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)
Hickey Run	Aug-29-2003	Dieldrin	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)
Hickey Run	Aug-29-2003	DDE	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)
Hickey Run	Aug-29-2003	DDD	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)
Hickey Run	Aug-29-2003	Heptachlor Epoxide	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)
Hickey Run	Aug-29-2003	PAH1 - 2 & 3 Ring Polycyclic Aromatic Hydrocarbons	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)
Hickey Run	Aug-29-2003	PAH2 - 4 Ring Polycyclic Aromatic Hydrocarbons	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)
Hickey Run	Aug-29-2003	PAH3 - 5 && Ring Polycyclic Aromatic Hydrocarbons	Point/Nonpoint Source	Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)

Figure 3. Screen image when clicked on "Hickey Run" and scrolled down to the TMDL section

Note: For discharges that enter a separate storm sewer system prior to discharge, the first Water of the U.S. to which you discharge is the waterbody that receives the water from the storm sewer system.

#### Step Three:

Determine if there are pollutants that have been both identified as a cause for impairment and potential pollutant source at the facility (Section 2). List any that apply to the impairment.

		Causes of Impairment for Reporting Year 2016
		Description of this table
Cause of Impairment	Cause of Impairment Group	Designated Use(s)
Arsenic	Metals (other than Mercury)	Protection Of Human Health Related To Consumption Of Fish And Shellfish
Chlordane	Pesticides	Protection Of Human Health Related To Consumption Of Fish And Shellfish
Chlorine, Residual (Chlorine Demand)	Chlorine	Protection And Propagation Of Fish, Shellfish And Wildlife
Copper	Metals (other than Mercury)	Protection Of Human Health Related To Consumption Of Fish And Shellfish
DDD	Pesticides	Protection Of Human Health Related To Consumption Of Fish And Shellfish
DDE	Pesticides	Protection Of Human Health Related To Consumption Of Fish And Shellfish
DDT	Pesticides	Protection Of Human Health Related To Consumption Of Fish And Shellfish
Dieldrin	Pesticides	Protection Of Human Health Related To Consumption Of Fish And Shellfish
Dissolved Oxygen Saturation	Organic Enrichment/Oxygen Depletion	Protection And Propagation Of Fish, Shellfish And Wildlife
Escherichia Coli (E. Coli)	Pathogens	Primary Contact Recreation
Heptachlor Epoxide	Pesticides	Protection Of Human Health Related To Consumption Of Fish And Shellfish
Other Flow Regime Alterations	Flow Alteration(s)	Protection And Propagation Of Fish, Shellfish And Wildlife
Polychlorinated Biphenyls (PCBs)	Polychlorinated Biphenyls (PCBs)	Protection Of Human Health Related To Consumption Of Fish And Shellfish
Polycyclic Aromatic Hydrocarbons (PAHs) (Aquatic Ecosystems)	Toxic Organics	Protection Of Human Health Related To Consumption Of Fish And Shellfish
Turbidity	Turbidity	Secondary Contact Recreation And Aesthetic Enjoyment, Protection And Propagation Of Fish, Shellfish And Wildlife, Primary Contact Recreation
Zin¢	Metals (other than Mercury)	Protection Of Human Health Related To Consumption Of Fish And Shellfish

Figure 4. Screen image under "Hickey Run" and scrolled down to Causes of Impairment section

## **Appendix C: Sector-Specific Requirements for Industrial Activities**

You must comply with Part 8 of the MSGP, which outlines sector-specific requirements associated with the facility's primary industrial activity and any co-located industrial activities. These sector specific requirements apply to those areas of your facility where those sector-specific activities occur. These requirements are in addition to any requirements specified elsewhere in this permit and your SWPPP.

To ensure that the facility is including the proper requirements please see Part 8 of the 2015 MSGP (<u>https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_part8.pdf</u>)

## Appendix D: Outfall Definition

In general, an industrial outfall is the point where stormwater associated with industrial activity discharges to waters of the District or a municipal separate storm sewer system (MS4). An outfall does not include conveyances, pipes, or tunnels connecting segments of the same system. Sometimes the actual receiving waterbody may be some distance away from the industrial site (e.g. when a facility's stormwater flows off-site to an outfall via a conveyance that is not part of an MS4 sometimes being commingled with discharges from other facilities, roadways, and other surfaces along the way). In such cases, the facility's outfall is considered the location at which discharges leave the industrial site, and the conveyance is a tributary to a receiving water.

For more information on the definitions of conveyances and stormwater terms, please use the MSGP frequently asked questions at https://www3.epa.gov/region10/pdf/npdes/stormwater/msgp\_faq\_aug2015.pdf

## Appendix E: Structural BMPs

Use these definitions of the below structural BMPs to assist in describing what your facility has on-site to manage stormwater runoff.

- 1. <u>Green Roof:</u> The facility has a green roof structure to capture and store rainfall in an engineered growing media that is designed to support plant growth. A portion of the captured rainfall evaporates and is taken up by plants, which helps reduce runoff volume, peak runoff rates, and pollutant loads. The roof is designed so that water drains vertically through the media and then horizontally along a waterproofing layer towards the outlet.
- Impervious Surface Disconnection: The facility has developed a strategy that involves managing runoff by intercepting, infiltrating, filtering, treating, or reusing it as it moves from an impervious surface to the drainage system. This disconnection practice is used to reduce the volume of runoff that enters the separate storm sewer system. The type of disconnection that this facility uses is \_\_\_\_\_\_.
   a. simple disconnection, whereby rooftops and/or on-lot residential impervious surfaces are directed to pervious areas or conservation areas (natural cover) or soil amended filter paths.
   b. disconnection leading to an alternative retention practice(s) adjacent to the roof.
- 3. <u>Permeable Pavement Systems</u>: The facility has a permeable paving system that allows water to soak through voids in an alternative pavement surface into an underlying stone reservoir. This allows runoff to be captured and treated instead of directly flowing into a storm drain. The filtered runoff is \_\_\_\_\_.

a. collected and returned to the conveyance system.

b. allowed to partially (or fully) infiltrate into the soil.

4. <u>Bioretention</u>: The facility has a bioretention system in place to capture and store stormwater runoff and pass it through a filter bed of engineered soil media composed of sand, soil, and organic matter. Filtered runoff is \_\_\_\_\_\_.

a. collected and returned to the conveyance system.

- b. allowed to infiltrate into the soil.
- 5. <u>Filtering Systems</u>: The facility has a filtering system in place to capture and temporarily store stormwater and pass it through a filter bed of sand media. The filter consists of two chambers: the first is devoted to settling and the second serves as a filter bed consisting of a sand filter media. Filtered runoff is

a. collected and returned to the conveyance system.

b. allowed to partially infiltrate into the soil.

The filter systems found on site is/are

- <u>Non-Structural Sand Filter</u>: This non-structural sand filter has two cells, with a (dry or wet) sedimentation chamber preceding the sand filter bed.
- <u>Surface Sand Filter</u>: This surface sand filter is designed with both the filter bed and sediment chamber located at ground level. The filter media is (sand, peat/sand mixture). The filter chambers are created using precast or cast-in-place concrete.
- <u>Underground Sand Filter</u>: This underground sand filter is modified to install the filtering components underground and is designed with an internal flow splitter or overflow device that bypasses runoff from larger stormwater events around the filter.

- Three-Chamber Underground Sand Filter: This three-chamber underground sand filter is a gravity flow system. The facility may be precast or cast-in-place. The first chamber acts as a pretreatment facility removing any floating organic material such as oil, grease, and tree leaves. It has a submerged orifice leading to a second chamber designed to minimize the energy of incoming stormwater before the flow enters the second chamber. The second chamber is the filtering and processing chamber. It contains the filter material consisting of gravel and sand and is situated behind a weir. Along the bottom of the structure is a subsurface drainage system consisting of a parallel, perforated PVC pipe system in a stone bed. A dewatering valve is installed at the top of the filter layer for safety release in cases of emergency. There is also a bypass pipe crossing the second chamber to carry overflow from the first chamber to the third chamber. The third chamber is the discharge chamber. It receives the overflow from the first chamber through the bypass pipe when the storage volume is exceeded. Water enters the first chamber of the system by gravity or by pumping. This chamber removes most of the heavy solid particles, floatable trash, leaves, and hydrocarbons. Then the water flows to the second chamber and enters the filter layer by overtopping a weir. The filtered stormwater is then picked up by the subsurface drainage system that empties it into the third chamber.
- <u>Perimeter Sand Filter</u>: This perimeter sand filter includes the basic design elements of a sediment chamber and a filter bed. The perimeter sand filter consists of two parallel trenches connected by a series of overflow weir notches at the top of the partitioning wall, which allows water to enter the second trench as sheet flow. The first trench is a pretreatment chamber removing heavy sediment particles and debris. The second trench consists of the sand filter layer. A subsurface drainage pipe is installed at the bottom of the second chamber to facilitate the filtering process and convey filter water into a receiving system. In this design, flow enters the system through grates at the edge of a parking lot. The perimeter sand filter is designed as an on-line practice (i.e., all flows enter the system), but larger events bypass treatment by entering an overflow chamber.
- 6. <u>Infiltration</u>: The facility has an infiltration practice that captures and temporarily stores stormwater before allowing it to infiltrate into the soil over a two-day period.

The infiltration practice(s) found on site is/are:

- <u>Grass channels</u> provide a modest amount of runoff filtering and volume attenuation within the stormwater conveyance system resulting in the delivery of less runoff and pollutants than a traditional system of curb and gutter, storm drain inlets, and pipes.
- <u>Dry swales</u>, also known as bioswales, are linear channels covered with turf or other surface material (other than mulch and ornamental plants). The dry swale is a soil filter system that temporarily stores and then filters stormwater. If soils are extremely permeable, runoff infiltrates into underlying soils; however, the runoff treated by the soil media flows into an underdrain, which conveys treated runoff back to the conveyance system further downstream. The underdrain system consists of a perforated pipe within a gravel layer on the bottom of the swale, beneath the filter media.
- <u>Wet swales</u> provide a modest amount of runoff filtering within the conveyance. These are linear wetland cells that intercept shallow groundwater to maintain a wetland plant community. The saturated soil and wetland vegetation provide an ideal environment for gravitational settling, biological uptake, and microbial activity.
- <u>Ponds</u>: This facility uses stormwater ponds, a combination of a permanent pool, micro-pool, or shallow marsh that promote a good environment for gravitational settling, biological uptake,

and microbial activity. Runoff from each new storm enters the pond and partially displaces pool water from previous storms. The pool also acts as a barrier to resuspension of sediments and other pollutants deposited during prior storms.

- <u>Tree Planting and Preservation</u>: This facility uses tree plantings as a means of managing stormwater. Tree canopies can intercept a significant amount of rainfall before it becomes runoff, particularly if the tree canopy covers impervious surface, such as in the case of street trees. Through the processes of evapotranspiration and nutrient uptake, trees have the capacity to reduce stormwater runoff volumes and improve water quality. Through root growth, trees can improve the infiltration capacity of the soils in which they grow.
- 7. <u>Storage Practices</u>: This facility uses storage practices to provide stormwater detention.

The storage practice(s) is/are:

- <u>Detention vaults</u> are box-shaped underground stormwater storage facilities and constructed with reinforced concrete.
- <u>Dry detention ponds</u> are an outlet structure that restricts stormwater flow so it backs up and is stored within the basin. This temporary ponding reduces the maximum peak discharge to the downstream channel, therefore reducing the effective shear stress on the bed and banks of the receiving stream.
- <u>Proprietary Practices:</u> This facility has proprietary practice structures on site. This is a manufactured stormwater treatment practices that utilize settling, filtration, absorptive/adsorptive materials, vortex separation, vegetative components, and/or other appropriate technology to manage the impacts stormwater runoff.

### **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><li> 2x per year</li><li> After major storms</li></ul>	<ul> <li>1x per year</li> <li>When sludge accumulates to 8<sup>+</sup> inches or oil on top is 2<sup>+</sup> inches deep</li> <li>After a major oil spill impacting the OWS tank capacity</li> </ul>
Sand filter	<ul> <li>2x per year check sedimentation</li> <li>1x per year check filter medium and structural integrity</li> </ul>	<ul> <li>1x per year for first chamber</li> <li>When sediment accumulation exceeds 6 inches and when water remains in basin after 72 hours (i.e., no standing water)</li> <li>Every 5 years remove and replace top sand layer, and as needed</li> </ul>
Vortech filtration system	• 2x per year	<ul> <li>1x per year, or when sediment has accumulated to 12-18 inches</li> </ul>
BaySaver filtration system	• Every 6 months	<ul> <li>Every 1-3 years</li> <li>When 2 feet of sediment has accumulated, or it shows a large accumulation of debris or oil</li> </ul>
Stormceptor	• 2-4x per year	<ul> <li>When sediment accumulates to approximately 15% of the unit's total storage capacity</li> <li>When oil is present in the oil inspection port</li> </ul>
Trees	<ul> <li>Every 3 months during first</li> <li>3 years, then</li> <li>1x per year and</li> <li>After storm events</li> </ul>	<ul> <li>Water trees as needed, especially during first three years and during drought</li> <li>When dead, diseased, or broken branches are found</li> </ul>
Storm drains and trench drains	Quarterly	<ul> <li>1x per year, or as needed, remove debris and replace filter fabric</li> <li>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</li> </ul>
Infiltration trench or basin	Quarterly	<ul> <li>1x per year clean out accumulated sediment, or as needed</li> <li>When water remains in observation well after 72 hours (i.e., no standing water)</li> <li>As needed replace pea gravel/topsoil and mow/prune vegetation removing the clippings</li> </ul>
Green roof	• 2x per year during growing season	<ul> <li>1x per year hand weed to remove invasive and volunteer plants and to repair bare areas</li> </ul>

ВМР Туре	Inspection Schedule	Maintenance Schedule
Bioretention and rain garden	• 2x per year	<ul> <li>4x per year mow grass filter strips and check curb cuts/inlets for debris</li> <li>2x per year weed, remove trash, and rake mulch</li> <li>1x per year mulch, prune, and remove sediment</li> <li>Every 2-3 years remove sediment and replace mulch and plants, and as needed</li> </ul>
Permeable pavement and pavers	• 1x per year	<ul> <li>2-3x per year mechanically sweep pavement with street sweeper to prevent clogging</li> <li>1x per year spot weed grass application</li> <li>Every 2-3 years remove sediment and fill voids, and as needed</li> </ul>
Open channel systems Including grass channel, dry swale, wet swale	• 4x per year	<ul> <li>Approximately 4x per year mow grass to maintain 4-6 inch height</li> <li>4x per year remove accumulated sediment, oil/grease, litter, and repair eroded areas</li> <li>1x per year plant to maintain 90% turf cover</li> </ul>
Drain inserts	Frequently. At least 8x per year	<ul> <li>Several times a year replace insert, as necessary</li> <li>When the structure does not drain completely within 48 hours after a storm event</li> </ul>
Filter socks	<ul> <li>Frequently. At least 8x per year</li> </ul>	<ul> <li>Several times a year replace filter sock, as necessary</li> <li>When sediment has accumulated to half the exposed height of sock, if torn, or when dislodged or ponding occurs</li> </ul>

#### Sources:

- 1. District of Columbia. 2013 Stormwater Management Guidebook: <u>https://doee.dc.gov/node/620102</u>
- 2. District of Columbia. Erosion and Sediment Control (ESC) Manual: <u>https://doee.dc.gov/node/1284771</u>
- 3. BaySaver. BaySeparator Technical and Design Manual: <u>https://baysaver.com/wp-content/uploads/2018/04/BaySeparator-Technical-and-Design-Manual.pdf</u>
- 4. BaySaver. BayFilter Inspection and Maintenance Manual: <u>https://baysaver.com/wp-content/uploads/2018/04/BayFilter-Maintenance-Sheet-02-18.pdf</u>
- 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: <u>https://www.epa.gov/sites/production/files/2016-02/documents/separator.pdf</u>
- King County, WA Department of Natural Resources and Parks. The Oil/Water Separator: How to select and maintain an oil/water separator <u>https://www.kingcounty.gov/~/media/services/environment/wastewater/industrialwaste/docs/TechAssistance/OilWaterFS\_0115.ashx?la=en</u>

## Appendix F: Analytical Monitoring

The MSGP permit includes five types of required analytical monitoring; one or more may apply to your facility's discharge.

## 1. Benchmark monitoring:

There may be specific benchmark parameters applicable to your facility's discharge. Benchmark parameters are determined by the industrial sector of any primary and any co-located industrial activities.

## Sectors that have benchmark monitoring are:

- Sector A Timber Products
- Sector B Paper and Allied Products
- Sector C Chemical and Allied Products Manufacturing, and Refining
- Sector D Asphalt Paving and Roofing Materials and Lubricant Manufacturing
- Sector E Glass, Clay, Cement, Concrete, and Gypsum Products
- Sector F Primary Metals
- Sector G Metal Mining
- Sector H Coal Mines and Coal Mining-Related Facilities
- Sector J Non-Metallic Mineral Mining and Dressing
- Sector K Hazardous Waste Treatment, Storage, or Disposal Facilities
- Sector L Landfills, Land Application Sites, and Open Dumps
- Sector M Automobile Salvage Yards
- Sector N Scrap Recycling and Waste Recycling Facilities
- Sector O Steam Electric Generating Facilities
- Sector Q Water Transportation
- Sector S Air Transportation
- Sector U Food and Kindred Products
- Sector Y Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries
- Sector AA Fabricated Metal Products

Refer to the 2015 MSGP Permit (Part 8), for the specific requirements for benchmark monitoring.

These requirements then should be listed in the facility's SWPPP

## 2. Effluent limitations guidelines monitoring:

**Effluent Guidelines** are national wastewater discharge standards that are developed by EPA on an <u>industry-by-industry basis</u>. These are <u>technology-based regulations</u>, and are intended to represent the greatest pollutant reductions that are economically achievable for an industry.

Table 6-1 (<u>Taken from 2015 MSGP Permit</u>) identifies the stormwater discharges subject to effluent limitation guidelines that are authorized for coverage under this permit. An exceedance of the effluent limitation is a permit violation. Beginning in the first full quarter of your date of discharge authorization, the facility must monitor once per year at each outfall containing the discharges identified in the table below for the parameters specified in the MSGP sector-specific section.

Regulated Activity	Effluent Limit	Monitoring Frequency	Sample Type
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	See Part 8.A.7	1/year	Grab
Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	See Part 8.C.4	1/year	Grab
Runoff from asphalt emulsion facilities	See Part 8.D.4	1/year	Grab
Runoff from material storage piles at cement manufacturing facilities	See Part 8.E.5	1/year	Grab
Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities	See Part 8.J.9	1/year	Grab
Runoff from hazardous waste landfills	See Part 8.K.6	1/year	Grab
Runoff from non-hazardous waste landfills	See Part 8.L.10	1/year	Grab
Runoff from coal storage piles at steam electric generating facilities	See Part 8.0.8	1/year	Grab
Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non- propeller aircraft departures.	See Part 8.S.8	1/year	Grab

#### Table 6-1. Required Monitoring for Effluent Limits Based on Effluent Limitations Guidelines

### Sectors that have Effluent Limitation Guidelines:

Sector A – Timber Products

Sector C – Chemical and Allied Products Manufacturing, and Refining

Sector E – Glass, Clay, Cement, Concrete, and Gypsum Products

Sector J – Non-Metallic Mineral Mining and Dressing

Sector K – Hazardous Waste Treatment, Storage, or Disposal Facilities

Sector L – Landfills, Land Application Sites, and Open Dumps

## These requirements then should be listed in the facility's SWPPP

## 3. State-specific monitoring

The District does not have any additional monitoring requirements.

#### 4. Impaired waters monitoring

1. Discharges to impaired waters without an EPA-approved or established TMDL: Beginning your date of discharge authorization, you must monitor all pollutants for which the waterbody is impaired and for which a standard analytical method exists (see 40 CFR Part 136) once per year at each outfall discharging stormwater to impaired waters without an EPA-approved or established TMDL. If the pollutant of concern for the impaired waterbody is suspended solids, turbidity, or sediment/sedimentation, you must monitor for Total Suspended Solids (TSS). If a pollutant of concern is expressed in the form of an indicator or surrogate pollutant, you must monitor for that indicator or surrogate pollutant. *No monitoring is required when a waterbody's biological communities are impaired but no pollutant, including indicator or surrogate pollutants, is specified as causing the impairment, or when a waterbody's impairment is related to hydrologic modifications, impaired hydrology, or other non-pollutant.* Permittees should consult the appropriate EPA Region 3 Office for any available guidance regarding required monitoring parameters under this part.

If the pollutant of concern is not detected and not expected to be present in your discharge, or it is detected but you have determined that its presence is caused solely by natural background sources, you may discontinue monitoring for that pollutant. To support a determination that the pollutant's presence is caused solely by natural background sources, you must document and maintain with your SWPPP:

• An explanation of why you believe that the presence of the pollutant of concern in your discharge is not related to the activities or materials at your facility; and

• Data and/or studies that tie the presence of the pollutant of concern in your discharge to natural background sources in the watershed.

## These requirements then should be listed in the facility's SWPPP.

2. Discharges to impaired waters with an EPA-approved or established TMDL: For stormwater discharges that reach a waterway with an EPA-approved or established TMDL, you are not required to monitor for the pollutant(s) for which the TMDL was written. EPA will examine the applicable TMDL and its wasteload allocation, and may inform you that the facility is subject to additional monitoring requirements because of the TMDL. *EPA's notice will include specifications on monitoring parameters and frequency.* Permittees must consult the appropriate EPA Region 3 office for guidance regarding required monitoring under this part.

## These requirements should then be listed in the facility's SWPPP.

## 5. Other monitoring as required by EPA:

EPA may notify you of additional discharge monitoring requirements that it determines are necessary to meet the permit's effluent limitations. Any such notice will briefly state the reasons for the monitoring, locations, and parameters to be monitored, frequency and period of monitoring, sample types, and reporting requirements. *These requirements then should be listed in the facility's SWPPP.* 

## Procedures Relating to Endangered Species in the 2015 Multi Sector General Permit (MSGP) for District of Columbia Government Facilities

## Overview:

The 2015 Multi Sector General Permit (MSGP) includes new procedures relating to endangered species protection. In the District, all facilities that require a MSGP have the potential to affect federally-listed species. Facilities will have to choose which eligibility criterion best suits their facility and apply for it. Detailed information on this process is outlined at <u>this EPA MSGP website</u><sup>1</sup> and in the <u>2015 MSGP Appendix E</u><sup>2</sup>. Once approved, your facility's SWPPP should include documentation supporting your eligibility determination, including the completed Criterion Selection Worksheet (found in Appendix E referenced above).

Your facility's criterion is selected based on the location and scope of the action area. The **action area** of your facility is defined as the site itself, areas where stormwater discharges originate and flow from the industrial facility to the point of discharge, and areas upstream and downstream in the waterbody to which the facility discharges that could be affected by pollution from your site. The action area for your facility depends on discharges of pollutants and discharge-related activities into downstream areas, the control measures you have in place, and receiving waterbody characteristics.



Figure 1. Example action area for a fictitious facility that discharges into the MS4 system.



Figure 2. Example action area for a fictitious facility that discharges directly into the Potomac River.

<sup>&</sup>lt;sup>1</sup> http://water.epa.gov/polwaste/npdes/stormwater/Multi-Sector-General-Permit-Threatened-and-Endangered-Species-Eligibility.cfm

<sup>&</sup>lt;sup>2</sup> http://water.epa.gov/polwaste/npdes/stormwater/upload/msgp2015\_appendixe-2.pdf

There are five endangered species protection criterions:

**Criterion A:** No federally-listed threatened or endangered species or their critical habitat is likely to occur in the action area.

• Few, if any, District facilities will fall under this criterion.

**Criterion B:** the facility is already addressed in another operator's valid certification of eligibility for your action area.

• If there are multiple operators at your facility and one has already obtained a valid certification of eligibility for your site's action area, you will have to fill out the Criterion B Eligibility Requirements with the other operator's information. There are additional details about this criterion in Appendix E of the MSGP.

**Criterion C:** 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.

- Most District facilities will fall under this criterion and will have to complete the Criterion C Eligibility Form. Steps are provided in the next section.
- Deadline for the Criterion C Eligibility form is a minimum of 30 days prior to submitting your NOI for permit coverage.
- DOEE has identified likely threatened or endangered species in the master spreadsheet, but you will have to complete the steps in the Criterion C Eligibility for a complete list of species in your action area.
- **NOTE:** If the northern long-eared bat is the only federally listed species potentially impacted by your facility, your facility qualifies for Criterion A.

**Criterion D and E:** These criteria are for facilities that have already consulted or obtained permits from the EPA, U.S. Fish and Wildlife Service, and/or National Marine Fisheries Service under section 7 or 10 of the Endangered Species Act. If your facility falls under this category, you must fill out the Criterion Selection Worksheet found in Appendix E of the 2015 MSGP.

## **Criterion C Eligibility Form:**

Fill out the <u>Criterion C Eligibility Form found here</u><sup>3</sup> and email to <u>msgpesa@epa.gov</u> along with any attachments and additional information that demonstrates how you will avoid or eliminate adverse effects to listed species or critical habitat. This needs to be done a minimum of 30 days prior to submitting the facility's NOI. You will need the following information to fill out the form:

- 1. Facility's Stormwater Pollution Prevention Plan:
  - a. 2008 MSGP Coverage Info:
    - i. If previously covered, you will need the NPDES ID number from your 2008 MSGP permit.
    - ii. If not covered under the 2008 MSGP, you will be considered a new discharger or source.
  - b. SIC Code or Primary Activity Code for the facility's primary Industrial sector.
    - i. Definition of **Primary Industrial Sector** from 2015 MSGP: *"It is recommended that the primary industrial determination be based on the value of receipts or revenues or, if such information is not available for a particular facility, the number of employees or production rate for each process may be compared. The operation that generates the most revenue or employs the most personnel is the operation in which the facility is primarily engaged."*
    - ii. Sectors of any co-located activities covered under the 2015 MSGP. These activities are indicated in <u>Appendix D</u><sup>4</sup>.
  - c. Receiving water information:
    - i. Location of all facility outfalls in decimal degrees.
    - ii. Name and type of receiving waters DOEE provided in master spreadsheet.
- 2. Any additional site-specific information related to your facility's discharges and discharge-related activities, including:
  - a. Monitoring and inspection results if available. This will help demonstrate that your facility already avoids or eliminates adverse effects to listed species or critical habitat.
- 3. Information on endangered and threatened species and any designated critical habitats from *two sources*.
  - a. You will need to provide a written description of the action area for your facility, and can include the map created in the IPaC system (directions are below in Section C). This should include the rationale for the extent of the action area. The example EPA provides is as follows:

The action area for the (name of your facility)'s stormwater discharges extends downstream from the outfall(s) in (name of receiving waterbody) (# of meters/feet/kilometers/miles). The downstream limit of the action area reflects the approximate distance at which the discharge waters and any pollutants would be expected to cause potential adverse effects to listed species and/or critical habitat because (insert rationale). The action area does/does not extend to the (name of receiving waterbody)'s confluence with (name of confluence waterbody) because (insert rationale).

- b. List of threatened or endangered species under National Marine Fisheries Service purview: Can be determined <u>from this map</u><sup>5</sup> or from the master spreadsheet DOEE has supplied.
- c. List of threatened or endangered species under U.S. Fish and Wildlife Service (FWS) purview: You will need to officially request a list of species from the U.S. Fish and Wildlife Service. This can be done from the online IPaC tool: <u>http://ecos.fws.gov/ipac</u>. *Using IPaC:* 
  - 1. Click on "Get Started"
  - 2. Then Click on "Enter Location"

<sup>&</sup>lt;sup>3</sup> http://water.epa.gov/polwaste/npdes/stormwater/upload/msgp2015\_appendixe-2.pdf

<sup>&</sup>lt;sup>4</sup> http://water.epa.gov/polwaste/npdes/stormwater/upload/msgp2015\_appendixd.pdf

<sup>&</sup>lt;sup>5</sup> http://water.epa.gov/polwaste/npdes/stormwater/upload/DC-and-Delaware-map-NMFS.pdf

- 3. In map tool:
  - Step 1: Search for your address
  - Step 2: Select the action area for your facility using one of the tools provided (sketch, polygon, or line tool) or import a shapefile.
  - Step 3: Confirm area
- 4. In your project's overview page under the "Tasks" section, select "request an official species list," and follow prompts. You can also review the species and print, export, and/or save the report.

## Appendix H: Procedures Relating to Historic Properties Preservation

Before an operator is eligible for coverage under the 2015 MSGP, the operator must meet one of the certification criteria related to historic properties included in the permit.

To determine if your property is a historic property in the District, input the facility's address into <u>https://propertyquest.dc.gov.</u>



NO: If the property has no determination of historic resources, it can be stated that the facility has no impact.

YES: If the property is determined to be a historic property and may be impacted by your construction or installation of control measures, the facility should contact the District's historic preservation office (HPO) (historic.preservation@dc.gov), in writing and request to discuss mitigation or prevention of any adverse effects. The letter should describe your facility, the nature and location of subsurface disturbance activities that are contemplated, any known or suspected historic properties in the area, and any anticipated effects on such properties. The letter should state that if the District's HPO representative does not respond within 30 days of receiving your letter, you may submit your NOI without further consultation. EPA encourages applicants to contact the appropriate authorities as soon as possible in the event of a potential adverse effect to an historic property. If the District's HPO sent you a response within 30 days of receiving your letter and you enter into, and comply with, a written agreement regarding how to address any adverse impacts on historic properties, you have met eligibility this eligibility. You should retain a copy of the written agreement.

If your facility does not have a determination listed, as in the above graphic, the facility will need to reach out to District's HPO (<u>historic.preservation@dc.gov</u>) to get an official determination via email.

## Appendix I: Unauthorized Non-Stormwater Discharges and MSGP Documentation

For the MSGP permit, the facility must conduct an evaluation for the presence of non-stormwater discharges. This evaluation must be conducted during dry weather when members of the SWPPT walk through the facility and look at the outfalls/discharge on site to determine if there are "dry weather flows" occurring (i.e., sources outside stormwater).

If there are any non-stormwater discharges found that are not authorized or covered by another permit, they must be eliminated. This includes vehicle and equipment/tank wash water. If not covered under a separate NPDES permit, wastewater, wash water, and any other unauthorized non-stormwater must be discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements, or otherwise disposed of appropriately.

Allowable Non-Stormwater Discharges for all Sectors of Industrial Activity:

- Discharges from emergency/unplanned fire-fighting activities;
- Fire hydrant flushings;
- Potable water, including water line flushings;
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage; and
- Landscape watering provided all pesticides, herbicides, and fertilizers have been applied in accordance with the approved labeling.

You must document that the facility has conducted the have evaluation for the presence of unauthorized nonstormwater discharges and include the below information in the SWPPP.

Documentation of your evaluation must include:

- The date of the evaluation;
- A description of the evaluation criteria used;
- A list of the outfalls or on-site drainage points that were directly observed during the evaluation; and
- The action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), or documentation that a separate permit was obtained. 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.

# **DOEE P2 Team's SWPPP Checklist**

Review Information				
Reviewer:	Date:			
Facility Name:				
Facility Address:				
Facility Type:   MSGP, Permit Id.	Critical Sou	rce		
Reason for Review:				
Structural BMP's Onsite:				
Last Regulatory Inspection:	Date:			
Issues Identified still an issue? Yes 🛛 🗆	No 🗆			
Comments sent to:	Date sent:			

			Self-ID'd Activities/Industrial Sector	
<u>NO</u>	<u>YES</u>	<u>N/A</u>	1. Stormwater pollution prevention team:	Notes:
			<ul> <li>Identifies current staff members (by name or title) that comprise the facility's SWPPT as well as their individual</li> </ul>	
			<ul><li>responsibilities.</li><li>Identifies individual responsibilities of team</li></ul>	
			<ul> <li>Staff members contact info is still accurate and working at facility</li> </ul>	
			<ul> <li>2. <u>Site description:</u></li> <li>Provides a description of the nature of the activities at</li> </ul>	
			<ul> <li>facility exposed to stormwater.</li> <li>Provides a general location map with enough detail to identify the location of facility and all receiving waters.</li> </ul>	
			<ul> <li>Describes other entities/agencies that operate out of the site and clarifies responsibilities (includes contractors)</li> <li>Describes seasonal activities that impact operations</li> </ul>	
			Describes discharges waters and TMDLS	
			<ul> <li>Includes Historical Preservation and Endangered Species Act considerations</li> </ul>	
			3. Summary of potential pollutant sources:	
			Provides a up-to-date list of activities exposed to stormwater	
			<ul> <li>Provides list of the pollutant(s) associated with each activity. List must include all significant materials that have</li> </ul>	
			been handled, treated, stored or disposed, and that have been exposed to stormwater in the three years prior to the date of the prepared SWPPP	
			Documents where potential spills and leaks could occur Spills/Leaks documents are up to date/three years prior	
			<ul> <li>Documents that evaluated for the presence of unauthorized non-stormwater discharges</li> </ul>	
			<ul> <li>Document the location of salt storage piles</li> <li>Summary of all stormwater discharge sampling data (MSGP)</li> </ul>	

VES	N/A		Notoci
115		4. Control measures:	Notes.
		Good Housekeeping:	
		- Provides a method & schedule used for determining when	
		pickup & disposal of waste materials occurs.	
		conditions of drums, tanks and containers.	
		<ul> <li>Overall provides information on general housekeeping</li> </ul>	
		methods such as putting things away, store materials inside/ under coveretc.	
		Maintenance:	
		- Provides preventative maintenance procedures & schedule to	
		- Provides procedures on regular inspections of control measures	
		avoid spills/leaks	
		- Provides procedure maintenance & repair of all control measures to avoid in leaks/ spills	
		- Provides maintenance procedures for structural BMP's & Green	
		- Provides back-up practices in place should a release event occur	
		while a control measure is off-line	
		• Spill Prevention and Response Procedures:	
		-Provides procedures for preventing & responding to spills & leaks	
		-Provides notification procedures for preventing and responding to spills and leaks	
		Erosion and Sediment Controls:	
		-Provides schedule & procedure for Erosion & Sediment controls	
		Employee Training:	
		<ul> <li>The training program addresses the following items:</li> <li>the importance of protecting water quality</li> </ul>	
		<ul> <li>the requirements of this permit</li> </ul>	
		<ul> <li>design, performance, operation &amp; maintenance standards</li> </ul>	
		<ul> <li>inspection procedures</li> </ul>	
		<ul> <li>the selection of appropriate storm water control measures</li> </ul>	
		<ul> <li>ways that job activities are to be performed in order to</li> </ul>	
		<ul> <li>prevent or minimize impacts to receiving waters</li> <li>procedures for tracking, inspecting, &amp; reporting</li> </ul>	
		the frequency/schedule of training	
		<ul> <li>A log of the dates on which employees received training</li> </ul>	
		Overall control measures adequately address potential source	es of pollution

NO VES N/A		Notes:
	6. Inspections & Monitoring:	10000
	Documents procedures & schedules for Routine self	
	inspections	
	Documents procedures & schedules for quarterly visual	
	assessment of stormwater discharges (MSGP)	
	Documents procedures & schedules for analytical monitoring	
	(MSGP):	
	- Benchmark monitoring	
	<ul> <li>Effluent limitations guidelines monitoring</li> </ul>	
	- Impaired waters monitoring	
	<ul> <li>Other monitoring as required by EPA</li> </ul>	
	Corrective Action Guidelines	
	Recordkeeping & reporting requirements (Including how/	
	when to update SWPPP)	
	7. Documentation to support eligibility considerations under	
	other federal laws (MSGP):	
	Provides documentation Regarding Endangered and	
	Threatened Species and Critical Habitat Protection	
	Provides documentation Regarding Historic Properties	
	8. Signature requirements:	
	SWPPP is signed and dated	
	<ul> <li>SWPPP modifications are signed and dated</li> </ul>	
	9. Sector specific requirements (MSGP):	
	Refer to Section 8 of the 2015 MSGP permit	
	Meets sector specific SWPPP requirements	
	Meets sector specific monitoring requirements	
	10. Additional Records	
	BMP maintenance & repair documents	
	Routine Self Inspection form	
	Monitoring and Inspection reports	
	Coursettive Astions	
	Corrective Actions     Log of SWDDD Lindotes	
	• Log of SwPPP Opdates	
	11 Additional Pacards required for MSCD (MSCD)	
	<u>11. Auditional Records required for MISGP (MISGP):</u>	
	• visual wonitoring form	
	• NUI	
	ESA documentation     Conv of optimized generative from EDA positivity of the second sec	
	Copy of acknowledgement received from EPA assigning your	
	INFUESIU	
	Copy of IVISGP of IIIK to It     Desuments showing why /how showers may itering achieved	
	Documents showing why/now changes monitoring schedule     & bonch mark oxcood ansos	
	a Other	
	• Ouler	

NO	YES	12. Site map has the showing:	<u>Notes:</u>
		- Boundaries of the property and the size in acres	
		- Location and extent of significant structures and impervious surfaces	
		- Directions of stormwater flow	
		- Locations of all stormwater control measures	
		- Locations of all stormwater conveyances including ditches, pipes, and swales	
		- Locations of potential pollutant sources identified	
		- Locations where significant spills or leaks identified have occurred	
		- Locations of stormwater inlets and outfalls, with a unique identification code for each, indicating if are treating one or more outfalls as "substantially identical" and an outline of the areas draining to each outfall -Points of discharge	
		-Areas of designated critical habitat for endangered or threatened species, if applicable.	
		<ul> <li>MSGP SWPPP's:</li> <li>Locations of all stormwater monitoring points</li> <li>Locations of all receiving waters, including wetlands, in the immediate vicinity of your facility. These include</li> <li>waterbodies listed as impaired and which are identified by your state, tribe, or EPA as Tier 2, Tier 2.5, or Tier 3 waters</li> <li>Locations of these activities exposed to precipitation:</li> <li>Fueling stations</li> </ul>	
		<ul> <li>Vehicle and equipment maintenance and/or cleaning areas</li> </ul>	
		- Loading/unloading areas	
		- Locations used for the treatment, storage, or disposal of wastes	
		- Liquid storage tanks	
		- Processing and storage areas	
		- Machinery	
		<ul> <li>Manufactured products, waste material, or by-products used or created by the facility</li> </ul>	
		- Transfer areas for substances in bulk	
		- Locations and sources of run-on to site from adjacent property	

Meets all map requirements

**General Comments:** 

## Quick Guide to Stormwater BMP Inspection and Maintenance Requirements

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.

ВМР Туре	Inspection Schedule	Maintenance Schedule
Oil/Water Separator	<ul><li> 2x per year</li><li> After major storms</li></ul>	<ul> <li>1x per year</li> <li>When sludge accumulates to 8<sup>+</sup> inches or oil on top is 2<sup>+</sup> inches deep</li> <li>After a major oil spill impacting the OWS tank capacity</li> </ul>
Sand Filter	<ul> <li>2x per year check sedimentation</li> <li>1x per year check filter medium and structural integrity</li> </ul>	<ul> <li>1x per year for first chamber</li> <li>When sediment accumulation exceeds 6 inches and when water remains in basin after 72 hours (i.e. no standing water)</li> <li>Every 5 years remove and replace top sand layer, and as needed</li> </ul>
Vortech filtration system	• 2x per year	• 1x per year, or when sediment has accumulated to 12-18 inches
BaySaver filtration system	• Every 6 months	<ul> <li>Every 1 to 3 years</li> <li>When 2 feet of sediment has accumulated, or it shows a large accumulation of debris or oil</li> </ul>
Stormceptor	• 2-4 x per year	<ul> <li>When sediment accumulates to approximately 15% of the unit's total storage capacity</li> <li>When oil is present in the oil inspection port</li> </ul>
Trees	<ul> <li>Every 3 months during first 3 years, then</li> <li>1x per year and</li> <li>After storm events</li> </ul>	<ul> <li>As needed water trees, especially during first three years and during drought</li> <li>When dead, diseased, or broken branches are found</li> </ul>
Storm drains and trench drains	• Quarterly	<ul> <li>1x per year, or as needed, remove debris and replace filter fabric</li> <li>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</li> </ul>

ВМР Туре	Inspection Schedule	Maintenance Schedule
Infiltration trench or basin	• Quarterly	<ul> <li>1x per year clean out accumulated sediment, or as needed</li> <li>When water remains in observation well after 72 hours (i.e. no standing water)</li> <li>As needed replace pea gravel/top soil and mow/prune vegetation removing the clippings</li> </ul>
Green roof	• 2x per year during growing season	• 1x per year hand weed to remove invasive and volunteer plants and to repair bare areas.
Bioretention and rain garden	• 2x per year	<ul> <li>4x per year mow grass filter strips and check curb cuts/inlets for debris</li> <li>2x per year weed, remove track, and rake mulch</li> <li>1x per year mulch, prune, and remove sediment</li> <li>Every 2-3 years remove sediment and replace mulch and plants, and as needed</li> </ul>
Permeable pavement and pavers	• 1x per year	<ul> <li>2-3 x per year mechanically sweep pavement with street sweeper to prevent clogging</li> <li>1x per year spot weed grass application</li> <li>Every 2-3 years remove sediment and fill voids, and as needed</li> </ul>
<b>Open channel</b> systems Including grass channel, dry swale, wet swale	• 4x per year	<ul> <li>Approximately 4x per year mow grass to maintain 4-6 inch height</li> <li>4x per year remove accumulated sediment, oil/grease, litter, and repair eroded areas</li> <li>1x per year plant to maintain 90% turf cover</li> </ul>
Drain Inserts	• Frequently. At least 8x per year	<ul> <li>Several times a year replace insert, as necessary</li> <li>When the structure does not drain completely within 48 hours after a storm event</li> </ul>
Filter socks	• Frequently. At least 8x per year	<ul> <li>Several times a year replace filter sock, as necessary</li> <li>When sediment has accumulated to half the exposed height of sock, if torn, and when dislodged or ponding occurs</li> </ul>
## 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: <u>https://baysaver.com/wp-content/uploads/2018/04/BaySeparator-Technical-and-Design-Manual.pdf</u>
- 4. BaySaver. BayFilter Inspection and Maintenance Manual: <u>https://baysaver.com/wp-content/uploads/2018/04/BayFilter-Maintenance-Sheet-02-18.pdf</u>
- 5. Contech. Vortechs® Guide: Operations, Design, Performance, and Maintenance: <u>https://www.portlandoregon.gov/bes/article/314404</u>
- 6. Imbrium Systems. Stormceptor Owner's Manual: <u>http://www.imbriumsystems.com/Portals/0/documents/sc/technical\_docs/Stormceptor%200</u> <u>wners%20Manual.pdf</u>
- 7. EPA. Oil/Water Separators: Best Environmental Practices for Auto Repair and Fleet Maintenance: <u>https://www.epa.gov/sites/production/files/2016-02/documents/separator.pdf</u>
- 8. King County Department of Natural Resources and Parks, WA. The Oil/Water Separator: How to select and maintain an oil/water separator <u>https://www.kingcounty.gov/~/media/services/environment/wastewater/industrial-waste/docs/TechAssistance/OilWaterFS\_0115.ashx?la=en</u>