



DISTRICT OF COLUMBIA MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PROGRAM INSPECTION REPORT

Remote Interview Dates: July 12, 13, and 15, 2022

Field Visit Dates: July 19–20, 2022

Report Date: September 2, 2022

Unique Project Identifier: 3E22WN099A

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EPA Region III Official: _____ September 2, 2022
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Table 1. Summary of Permit Requirements and Review Observations

Program Element	Observations
Overall Program Management	No areas of concern noted.
Construction Activities	<p>Observation 1. The DC MS4 program has not set inspection frequency for construction sites, and it is up to the discretion of the individual inspector. The DC MS4 program has standard operating procedures (SOPs) for the inspection of construction projects.</p> <p>Observation 2. DC DOEE staff presented SOP IED-320 which presents detailed procedures for the pre-construction meeting, pre-inspection procedures, inspection procedures, inspection report procedures, changes to a DOEE approved plan, and SWM Plan as-built plan review and approval.</p>
Illicit Discharges and Illegal Disposal	<p>Observation 3. DOEE representatives were unsure if the DOEE’s Dry Weather Outfall Inspection Form is used to perform dry weather screening inspections.</p> <p>Observation 4. DOEE representatives provided dry weather outfall inspection results in an interactive ArcGIS map that reported all outfalls, locations, dates of inspections, physical characteristics, and details about re-inspections of illicit discharges. During the inspection, DOEE representatives stated that dry weather flows were investigated as illicit discharges once they were observed.</p> <p>Observation 5. During the inspection, DOEE representatives stated that if visual monitoring indicates no measurable dry weather flow, but there is evidence of intermittent discharge, inspectors revisit the outfall sometime in the range of within 24 hours of the initial inspection to within a week.</p> <p>Observation 6. Observations at Outfall 218.</p> <p>Observation 7. Observations at Outfall 999.</p>
Targeted Pollutant Controls	<p>Observation 8: The District uses trash traps throughout the MS4 to capture trash and prevent it from flowing downstream. The traps are located throughout the District in areas with high estimated trash accumulation.</p> <p>Observation 9. Observations at Outfall 999 trash trap.</p>

Program Element	Observations
Operation and Maintenance of Stormwater Control Measures	Observation 10. Observations at the DPW NE Fleet Parking and Storage Facility.
	Observation 11. Observations at the Fort Totten Solid Waste Disposal Transfer Station.
	Observation 12. Observations at the DDOT Street and Bridge Maintenance Facility.
	Observation 13. Observations at the National Park Service Rock Creek Park Maintenance Yard.
	Observation 14. Observations at the South Capitol Street Salt Dome.
	Observation 15. Observations at the DPW Impound Lot.
Observation 16. Observations at the Office of the State Superintendent of Education (OSSE) Southwest Terminal.	

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- Appendix B: EPA Records Requests and Agenda
- Appendix C: Photo Log
- Appendix D: Exhibit Log

INTRODUCTION

On July 12, 13, and 15, and 19-20, 2022, EPA, Region III representatives and EPA contractors (hereinafter, EPA Inspection Team) performed a compliance review of the District of Columbia's (hereinafter, "DC", "the District", or "Permittee") Municipal Separate Storm Sewer System (MS4). The compliance review was conducted to assess DC's compliance with the requirements of the Government of DC's *National Pollutant Discharge Elimination System (NPDES) General Permit to Discharge Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s)* (NPDES Permit No. DC0000221; hereinafter, the "Permit"). A copy of the Permit is provided in [Appendix A](#).

The purpose of this compliance review was to obtain information to assist EPA, Region III in assessing DC's compliance with the requirements of the Permit, as well as the implementation status of its current MS4 program. The presentation of observations in this report does not constitute a formal compliance determination or notice of violation.

The review focused on overall program management and the following Permit components:

- Construction Activities
- Illicit Discharge and Illegal Disposal
- Targeted Pollutant Controls
- Operation and Maintenance of Stormwater Control Measures

The EPA Inspection Team obtained information through a records review and interviews with DOEE staff. Interviews were conducted remotely and during the onsite portion of the compliance review. A copy of the EPA records request and review agenda is included in [Appendix B](#). The following primary representatives participated in the review:

DOEE/Other DC

Representatives: Joshua Rodriguez – Associate Director, Inspection and Enforcement Division (Virtual)
David Pilat – Branch Chief, Illicit Discharge and NPDES (Virtual)
Julienne Bautista – Branch Chief, Stormwater and Green Area Ratio (Virtual)
Meredith Upchurch – Associate Director, Regulatory Review Division (Virtual)
Keren O'Brien Murphy – Program Analyst (Virtual)
Matthew Gallagher – Branch Chief, Planning and Reporting (Virtual)
Jonathan Champion – Associate Director, Water Quality Division (Virtual)
Steve Saari – Associate Director, Watershed Protection Division (Virtual)
Walter Caldwell – Branch Chief, Construction and Maintenance (Virtual)
Emily Rice – Branch Chief, Partnering and Environmental Conservation (Virtual)
Matt Johnson – Branch Chief, Green Infrastructure Incentives & Assessment (Virtual)
Caroline Burnett – Assistant General Counsel (Virtual)

Rickeisha Goldsby – Environmental Protection Specialist, Inspection and Enforcement Division (Field)
Mary Polacek – Environmental Protection Specialist, Illicit Discharge and NPDES Branch (Field)
Emily Heller – Environmental Protection Specialist, Illicit Discharge and NPDES Branch (Field)
Teamrat Gebremedhin – Environmental Protection Specialist, Illicit Discharge and NPDES Branch (Field)
Ibrahim Famuditimi – Environmental Protection Specialist, Illicit Discharge and NPDES Branch (Field)
Lawrence Omoregbe – Environmental Engineer, Construction and Maintenance (Field)
Herman Knight – Environmental Protection Specialist, Illicit Discharge and NPDES Branch (Field)
Jerald Davis – Fuel Management Specialist, DC Department of Public Works (DPW) (Field)
Melvin Hodges – Stormwater Pollution Prevention Plan (SWPPP) Administrator, DPW Safety and Security Administration (SSA) (Field)
Keith Leftwitch – DPW Sanitation Supervisor (Field)
Paulette Redman-Smith – DPW Sanitation Supervisor (Field)
Acedus Broadus – DPW Sanitation Supervisor (Field)
Antwon Temoney – Abandoned Vehicle Program Manager (Field)
Calvin Anderson - Office of the State Superintendent of Education (OSSE) (Field)
Jose Saravia – Fort Totten Transfer Station Operations Supervisor (Field)

EPA

Representatives:

Ingrid Hopkins – EPA Region III (Virtual)
Shane McAleer – EPA Region III (Virtual)
Edward Simas – EPA Region III (Virtual and Field)

EPA

Contractors:

Kelly Davis – ERG (Virtual and Field)
Taylor Fontaine – PG Environmental (Virtual and Field)
Adira Nair – ERG (Virtual and Field)
Mariah Papac – PG Environmental (Virtual)

Additional

Representatives:

John T Westbrook – Superintendent, Turner Construction Company (Field)
Nicole Schneiter – Environmental Scientist, Tetra Tech (Field)
Donald Kirk – Facility Manager, National Park Service (Field)

OFFSITE INSPECTION PROCESS

On July 12, 13, and 15, 2022, the EPA Inspection Team conducted an offsite compliance review of the District’s MS4 program via conference call interviews. The offsite compliance review focused on overall program management and four (4) minimum control measures (MCMs) described in the District’s MS4 Permit: Construction Activities, Illicit Discharges and Illegal Disposal, Targeted Pollutant Controls, and Operation and Maintenance of Stormwater Control Measures, specifically for areas within the jurisdictional boundary of the DC MS4.

ONSITE INSPECTION PROCESS

On July 19-20, 2022, the EPA Inspection Team conducted field visits at a total of two (2) MS4 outfalls and nine (9) operations subject to MS4 program requirements and oversight: one (1) street maintenance facility, one (1) waste recycling transfer facility, two (2) salt storage facilities, (1) park maintenance site, one (1) active construction site, one (1) impound lot, one (1) fuel site, and one (1) school bus terminal.

Inspection observations based on both the offsite compliance review and the field visits are documented in the sections below.

ONSITE INSPECTION OPENING CONFERENCE

The EPA Inspection Team arrived at The Fields at RFK Stadium in Washington, DC at 8:00 a.m. (EST) on July 19, 2022, as a central meeting place for the site field visits. Taylor Fontaine of PG Environmental displayed his Clean Water Act inspector credential to the DOEE representatives at the outset of the inspection and explained that the purpose of the inspection was to make field visit observations to complement the offsite compliance review of the DC MS4 program conducted July 12, 13, and 15, 2022. A copy of the inspection sign-in sheet is included in the Exhibit Log in [Appendix D, Exhibit 1](#).

During the two days of field visits, the weather was sunny with temperatures averaging approximately 93 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the dates of the inspection and five (5) days prior are provided in the table below. Note the precipitation the day before the inspection.

Table 2. Total Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount (inches) ¹
WASHINGTON 2.6 NE, DC US US1DCDC0026	July 14, 2022	0.01
WASHINGTON 2.6 NE, DC US US1DCDC0026	July 15, 2022	0.00
WASHINGTON 2.6 NE, DC US US1DCDC0026	July 16, 2022	0.04
WASHINGTON 2.6 NE, DC US US1DCDC0026	July 17, 2022	0.01
WASHINGTON 2.6 NE, DC US US1DCDC0026	July 18, 2022	1.37
WASHINGTON 2.6 NE, DC US US1DCDC0026	July 19, 2022	0.00

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

Station Name	Date	Precipitation Amount (inches) ¹
WASHINGTON 2.6 NE, DC US US1DCDC0026	July 20, 2022	0.00

DC DOEE BACKGROUND

DOEE has their headquarters office located in the center of DC. DOEE employs approximately 300 environmental professionals. Their work ranges from issuing permits to inspecting facilities. DC’s MS4 requirements are enforced by DOEE, primarily by the Inspection and Enforcement Division, Illicit Discharge Branch, Watershed Protection Division, Regulatory Review Division, and Water Quality Division. Other entities assist DOEE with MS4 Permit compliance including DC’s Department of Transportation (DDOT), Green Infrastructure Division, Department of Public Works (DPW) and DC Water.

DC’s MS4 covers approximately 68 square miles and serves roughly 689,545 people. The MS4 is broken up into quadrants and is located along the outer edges of DC. The MS4 serves two-thirds of the city. The remaining one third is serviced by the centrally located combined sewer system (CSS), which was not part of this inspection. The primary receiving waters for the MS4 are the Anacostia River, Potomac River, Rock Creek, and their associated tributaries.

The day-to-day operations of the MS4 program occur under DOEE’s supervision. DOEE reviews stormwater plans, inspects outfalls, and investigates illicit discharges. These activities are provided by the different divisions within the DOEE.

- The Regulatory Review Division reviews plans daily for stormwater compliance through the Surface and Groundwater System (SGS) portal. The triggers for review are based on the square footage of disturbance and the overall cost of the project.
- Outfalls and construction activities are inspected routinely by the Inspection and Enforcement Division’s field inspectors.
- Illegal disposal and illicit discharges are monitored and investigated by the NDPES and Illicit Discharge Branch.
- Targeted pollutants are regulated by the Water Quality Division and the Watershed Protection Division. DC has focused on the prevention and removal of trash from the Anacostia River using food service laws, trash traps, and volunteer efforts.

DOEE staff explained that the DC MS4 program is primarily funded using the Enterprise Fund, which is entirely dedicated to the MS4 program. The Enterprise Fund supports approximately 60 staff members and most of the MS4 maintenance, inspection, construction, and design activities. Additionally, there is a city stormwater fee that is used as a special revenue fund that also helps fund the MS4 program.

According to DOEE representatives, DOEE was authorized to discharge under the NPDES Permit on May 23, 2018, until its expiration on June 22, 2023. DOEE has a stormwater management plan (SWMP), last updated January 22, 2016, that contains procedures for implementing the MS4 program (refer to [Appendix D, Exhibit 2](#)). At the time of the inspection, DOEE was in the process of updating the SWMP, having held the public comment period, with a planned submittal to EPA scheduled for September 2022.

INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS

The EPA Inspection Team obtained documentation and other supporting information to evaluate compliance with the Permit prior to, during, and after meeting with Permittee staff during the remote interview and field visits. Observations regarding DOEE's implementation of Permit requirements are presented in this report.

On June 24, 2022, the EPA Inspection Team provided the Permittee with a records request that listed documents to be available for review during the inspection, with certain items to be provided prior to the inspection (refer to [Appendix B](#)). DOEE made numerous documents available electronically to the EPA Inspection Team utilizing a shared folder on July 8, 2022. The EPA Inspection Team reviewed the documentation and other supporting evidence provided by DOEE regarding compliance with the Permit. Referenced documentation used as supporting information is provided in [Appendix C, Exhibit Log](#).

On July 28, 2022, after the field visit, the EPA Inspection team emailed the Permittee with an additional list of requested documents (refer to [Appendix B](#)). These documents were provided on August 3, 2022.

The following sections of this report describe DOEE's approach to implementing minimum control measures, the relevant Permit requirements, and observations made during the review process.

CONSTRUCTION ACTIVITIES

All development in the District must meet the requirements of DOEE's 2013 Rule on Stormwater Management and Soil Erosion and Sediment Control (2013 Stormwater Rule), which states, "Major land-disturbing activity must retain the first 1.2" of rainfall on site or through a combination of on-site and off-site retention. Major substantial improvement activity must retain the first 0.8" of rainfall on site or through a combination of on-site and off-site retention²." According to the 2016 SWMP, DOEE reviews all stormwater management plans for regulated development projects. The 2013 Stormwater Rule requires developers to provide an erosion and sediment control (ESC) plan for any development that will cause a minimum of 50 square feet of land disturbance, and these plans must contain stabilization and structural controls (refer to [Appendix D, Exhibit 3](#)). According to the 2016 SWMP, a "major substantial improvement activity is a substantial improvement activity and associated land-disturbing activity, including such activities that are part of a common plan of development, for which the combined footprint of improved building and land-disturbing activity is five thousand square feet (5,000 ft²) or greater, and the value of the construction activity is greater than 50% of the preconstruction structure value" (refer to [Appendix D, Exhibit 2](#)).

Review priority is given to major land disturbing activities. Major land disturbing activities are also required to develop a SWMP. The ESC plans are received by DOEE's intake program staff and Department of Consumer and Regulatory Affairs (DCRA) staff to verify if the plans meet

² 2013 Rule on Stormwater Management and Soil Erosion and Sediment Control

the requirements to warrant a full review and need to be placed into the SGS portal. According to the District’s 2021 Annual Report, DOEE developed the SGS portal in 2014 to, “help track, manage, review, and inspect stormwater management control measures within the District. The system is also used to manage submission, review, and inspection of Stormwater Management Plans, Erosion and Sediment Control Plans, and Green Area Ratio Plans.”

DOEE staff also review all submitted SWMPs for major land disturbances. DOEE Inspection and Enforcement Division, Construction and Maintenance Branch staff conduct inspections to ensure erosion and sediment controls at major land disturbance sites are installed properly and being implemented in accordance with the SWMP.

Once ESC plans are approved for smaller projects (less than 5,000 square feet), DOEE staff may conduct an optional pre-construction meeting before groundbreaking operations, whereby the ESC plans are discussed, and the project schedule is established. According to the DOEE SOP IED-320, “An ESC pre-construction meeting is optional when land disturbing activity is less than 50 square feet, the total construction cost does not exceed \$2,500, and an ESC plan is not required” (refer to Appendix D, Exhibit 4). Once the project is complete, there is a final closeout meeting.

For major land disturbing activities, DOEE will conduct a pre-construction meeting that includes discussion on the plan BMPs. This meeting will include a general contractor and a design engineer and may include the installation subcontractors, and the assigned DOEE inspector will determine the inspection schedule and associate milestones for each BMP. As with smaller projects, there is a closeout meeting once construction is complete and the site has achieved final stabilization. However, for major land disturbing activities, final as-built drawings for post construction stormwater controls are required before project sign-off by DOEE.

CONSTRUCTION SITE VISIT SPECIFIC OBSERVATIONS

Permit Part 3.5.3 (Construction Activities) states that Permittee shall “continue to implement inspection procedures, including but not limited to inspection of permitted construction sites that disturb more than 5,000 square feet of soil, as follows:

- a. Pre-construction meeting to review soil and sediment control measures;
- b. Initial site inspection to verify proper installation and maintenance of sediment and erosion control measures;
- c. Other inspections, as necessary, to ensure compliance with relevant standards and requirements; and
- d. Final inspection to verify proper installation of stormwater control measures following final stabilization of the project site.

The Permittee shall ensure that construction activity inspectors prioritize inspections in targeted areas, such as sites discharging to water quality-impaired waters, sites near surface waters, areas undergoing rapid development, large construction sites, and sites with a history of non-compliance.”

Observation 1: DOEE had not implemented a set construction stormwater inspection frequency during and after construction (e.g., once a month, biweekly, or

similar). The inspection schedule for each site is up to the discretion of the individual inspector based on the nature of the site and anticipated impact.

Observation 2: DOEE presented SOP IED-320 (refer to [Appendix D, Exhibit 4](#)) is “...the Standard Operating Procedure (SOP) for the inspection of the construction projects for compliance with DOEE Plans, including soil erosion and sediment control, stormwater management, best management practices, green area ratio, and stormwater pollution prevention plans within the Construction and Maintenance Branch of the Inspection and Enforcement Division of the District Department of Energy and Environment.” SOP IED-320 presents detailed procedures for the pre-construction meeting, pre-inspection procedures, inspection procedures, inspection report procedures, changes to a DOEE approved plan, and SWM Plan as-built plan review and approval.

Site No. 1: Cedar Hill Regional Medical Center

Address/Location: 2700 Martin Luther King Jr Ave SE, Washington, DC 20032

Relevant Minimum Control Measure (MCM): Construction Activities

Entry Time: 8:40 AM (EDT) July 20, 2022

Exit Time: 10:00 AM (EDT)

Site Description: The Cedar Hill Regional Medical Center (hereinafter, Medical Center) is an active construction site that is part of a larger multi-use development complex. The site is the location of a planned 136-bed, full-service hospital, ambulatory pavilion for physician offices, clinics and community space, a 500-car garage, and a helipad for emergency transports. At the time of the inspection, the Cedar Hill Regional Medical Center Site was undergoing shoring and grading activities. The Site is owned by the District and operated by Turner Construction Company.

Site Conditions: The EPA Inspection Team made the following observations from the inspection of Medical Center construction site.

- 1) Stormwater onsite is directed to three (3) sediment traps along the east perimeter of the Site via a trench along the north perimeter of the Site and sumps throughout the Site (refer to [Appendix C, Photographs 1, 2, and 3](#)). Stormwater then infiltrates into the soil or is evaporated. Overflow from two (2) of the sediment traps is discharged to a ravine and unnamed stream to the site’s east border (refer to [Appendix C, Photograph 4](#)). Overflow from the third sediment trap is discharged to another stormwater structure not maintained or owned by the District.
- 2) The EPA Inspection Team observed sediment track-out from the stabilized construction entrance onto a public right of way (refer to [Appendix C, Photograph 5](#)).
- 3) The EPA Inspection Team observed an unlabeled and uncovered 55-gallon drum in the southwest area of the site (refer to [Appendix C, Photograph 6](#)).

- 4) The EPA Inspection Team observed several portable toilets not properly installed to minimize or prevent a sanitary spill or release (refer to [Appendix C, Photograph 7](#)).
- 5) The EPA Inspection Team observed spilled dried concrete washout on the ground adjacent to a washout station in the Site's mid-southern area (refer to [Appendix C, Photograph 8](#)).
- 6) The EPA Inspection Team observed hydraulic fluid leaking from a piece of equipment in the Site's mid-east area. The leak was not collected in a drip pan or otherwise contained (refer to [Appendix C, Photograph 9](#)).
- 7) The EPA Inspection Team observed the DOEE sign posted on the outside of the site did not contain a contact name for obtaining additional construction site information or the permit tracking number assigned to the site Notice of Intent (NOI) (refer to [Appendix C, Photograph 10](#)).
- 8) The Facility had a copy of the stormwater pollution prevention plan (SWPPP) onsite.

ILLICIT DISCHARGE AND ILLEGAL DISPOSAL

According to the DOEE representatives, the District has approximately 575 MS4 outfalls. DOEE's NPDES and Illicit Discharge Branch conducts dry weather screenings and illicit discharge investigations. Dry weather screenings are conducted on an ongoing basis. The schedule of dry weather screenings is not documented; however, the District's goal is to screen all outfalls within the Permit term. The District aims to inspect high priority outfalls yearly and low priority outfalls every two years. The District utilizes two inventories to maintain outfall and dry weather screening inspection results. The geographic information system (GIS) analyst team within DOEE updates inventories during inspections and during watershed surveys.

The District's Department of Public Works (DPW) maintains a program to support the prohibition of disposal of household hazardous wastes and yard waste. The program includes scheduled days where DPW will pick up hazardous waste from households, which may include vehicle fluids. DPW will also pick up yard waste such as grass clippings and leaf litter upon request and during events in the fall.

The District's NPDES and Illicit Discharge Branch and Hazardous Waste Branch inspect commercial facilities and perform compliance monitoring of facilities that collect motor vehicle fluids. Additionally, the Urban Sustainability Administration's (USA) Green Ridge program reaches out to auto body shops to make them aware of fluid disposal requirements.

The District maintains a transfer station on Bates Road called Fort Totten Solid Waste Disposal Transfer Station (Fort Totten) that collects trash, recyclables, and bulk material from within the District. A drop-off station for public use is under construction at Fort Totten (see the Site No. 6 description below for more information on Fort Totten).

Pet waste is collected by the Mayor's Office of Clean City (MOCC). The MOCC maintains signage across the city and associated fines for illegal disposal.

The District’s Department of Public Works, Department of Parks and Recreation, and Pollution Prevention Group, and Watershed Protection Division publicize and promote the prohibition of illicit discharges to the public via social media and by providing educational materials on paper by request.

At the time of the inspection, the District’s Bacteria Source Tracking Study was being conducted by DOEE’s Watershed Protection Division in coordination with EPA’s Office of Research and Development. The study began in 2020 and the District is currently waiting for EPA to conclude final analysis and interpretation of results. The District expects to submit the report along with the annual report in December 2022. DOEE representatives stated that they received an extension on the Permit-required due date of July 1, 2021, from EPA’s Region III NPDES Office.

ILLICIT DISCHARGE AND ILLEGAL DISPOSAL SITE VISIT SPECIFIC OBSERVATIONS

Permit Part 4.4.1.1 states that “The Permittee shall ensure that field crews visually assess each MS4 outfall using DOEE’s Dry Weather Outfall Inspection Form, documenting outfall identification, location and physical characteristics such as the presence of odor, oily sheen, turbid discharge and floatables, and any other dry weather flows. Photos, forms and notes on changes since the previous inspection shall be linked to the outfall database.”

Observation 3: DOEE representatives could not confirm that DOEE’s Dry Weather Outfall Inspection Form is used to perform dry weather screening inspections, as required by the MS4 Permit. DOEE representatives stated during the screenings, online inspection forms are completed on iPad tablets, but DOEE representatives were unsure if the forms were DOEE’s Dry Weather Outfall Inspection Forms.

Observation 4: DOEE representatives provided dry weather outfall inspection results in an interactive ArcGIS map that reported all outfalls, locations, dates of inspections, physical characteristics, and details about re-inspections of illicit discharges. During the inspection, DOEE representatives stated that dry weather flows were investigated as illicit discharges once they were observed. Photos, forms, and notes on changes since previous inspections were not linked to the map, however.

Permit Part 4.4.1.4 states that, “If visual monitoring indicates that there is no measurable dry weather flow, but there is evidence of intermittent discharge (e.g., staining, small trickle, algal growth), the Permittee shall revisit the outfall within three (3) days of the previous visual monitoring to check for measurable flow.”

Observation 5: During the inspection, DOEE representatives stated that if visual monitoring indicates that there is no measurable dry weather flow, but there is evidence of intermittent discharge, inspectors revisit the outfall sometime in the range of within 24 hours of the initial inspection to within a week.

ILLICIT DISCHARGE AND ILLEGAL DUMPING SITE VISIT SPECIFIC OBSERVATIONS

Site No. 2: Outfall 218

Address/Location: 38°55'01.9"N 76°58'09.4"W

Relevant Minimum Control Measure (MCM): Illicit Discharge and Illegal Dumping

Entry Time: 10:15 AM (EDT) June 19, 2022

Exit Time: 10:45 AM (EDT)

Site Description: Outfall 218 is a high priority outfall that is inspected at least once a year. High priority outfalls are those that have been identified as having high pollutant potential, those located in sensitive areas, and those that have received past complaints. The Watershed Protection Division oversees the maintenance of the outfall. The outfall receives stormwater from approximately 650 acres of mixed/industrial use sources in the Hickey Run sewershed. The outfall discharges to Hickey Run, a tributary to the Anacostia River. DOEE representatives stated that the outfall receives maintenance by a contractor every 6 months.

At the time of the inspection, the outfall was undergoing an open sanitary misconnection investigation to determine the sources of previously observed discharges with oil sheen and other pollutants.

Observation 6: The EPA Inspection Team made the following observations at Outfall 218.

- 1) The EPA Inspection Team observed minimal flow from the outfall at the time of the inspection. Foam was observed on the discharge from the outfall (refer to [Appendix C, Photographs 11 and 12](#)).
- 2) After the inspection, the EPA Inspection Team received the most recent maintenance and inspection report completed on 6/27/2022 (refer to [Appendix D, Exhibit 5](#)). In the photos taken after maintenance was performed, the outfall's discharge had foam and visible oil sheen. The maintenance and inspection report did not request follow up maintenance to address the unresolved foam and oil sheen.

Site No. 3: Outfall 999

Address/Location: 38°57'04.6"N 76°59'07.8"W

Relevant Minimum Control Measure (MCM): Illicit Discharge and Illegal Dumping

Entry Time: 1:30 PM (EDT) June 19, 2022

Exit Time: 1:45 PM (EDT)

Site Description: Outfall 999 is a high priority outfall inspected weekly and after rain events of 0.25 inches or greater. Discharge from the outfall flows to the northwest branch of the Anacostia River in Maryland.

Observation 7: The EPA Inspection Team made the following observations at Outfall 999.

- 1) The EPA Inspection Team observed a significant amount of trash in the trash trap located at the outfall (refer to [Appendix C, Photographs 13 and](#)

- 14). The EPA Inspection Team did not observe trash at the outfall itself or in discharge.
- 2) The EPA Inspection Team observed significant flow from the outfall at the time of the inspection, though the inspection was conducted within 24 hours of a heavy rain event (refer to Appendix C, Photographs 13 through 15). The discharge from the outfall to the Anacostia River was clear and free of visible pollutants.

TARGETED POLLUTANT CONTROLS

DOEE regulates the removal and reduction of targeted pollutants with the support of other local agencies including, but not limited to, non-profit organizations, DC Water, DC DPW, U.S. Army Corps of Engineers (USACE), and the Office of Clean City. The main divisions within DOEE that enforce Targeted Pollutant Controls are the Water Quality and Watershed Protection Divisions. The representatives from these divisions explained DOEE's implementation strategies to control target pollutants over the past Permit term. The EPA Inspection Team did not learn of any previous non-compliance issues for Targeted Pollutant Controls during the virtual inspection calls.

DOEE representatives discussed their strategies for attaining, preventing, and removing 108,347 pounds of trash annually from the Anacostia River. The amount of trash to be removed under the MS4 was determined in the Anacostia River Watershed Trash total maximum daily load (TMDL). The District maintains nine (9) trash traps on the Anacostia River alone. The technologies and activities that decrease the amount of trash in the Anacostia River can be split into two categories: prevention and removal.

Two prevention strategies focus on food retailers, a 5-cent bag fee and a polystyrene foam ban. The Anacostia Clean Up and Protection Act of 2009 implemented a 5-cent bag fee incurred on the patron for every non-reusable plastic or paper bag used. The District implemented a polystyrene foam ban in 2016 and amended the ban in 2021 to include foam loose-fill packaging material, and foam storage containers. These regulations are enforced through annual inspections on randomly selected retailers. The inspectors will evaluate whether the business is following the protocols established by the bans, if not, enforcement action may be taken at the discretion of the inspector. The fee and ban focus on decreasing the amount of trash produced to begin with.

The other strategies to minimize the amount of trash entering the Anacostia include street sweeping and DumpBusters Illegal Dumping Enforcement Program. DOEE works with the DPW and the Metropolitan Police Department to enforce these strategies.

DOEE employs many strategies to remove trash from the Anacostia River. DOEE funds the operation and maintenance of nine (9) trash control structures on the Anacostia River, works with non-profits to organize volunteer cleanup events, enlists DC Water and the USACE to utilize their skimmer fleets to collect trash, and works with Clean Teams from the Department of Small and Local Business Development to remove litter throughout DC. In 2020, these measures removed 9 million pounds of trash from the Anacostia River according to DOEE representatives.

DPW is responsible for the collection and disposal of household hazardous waste and leaf and yard waste. The Benning Road Transfer Station is the location for regular drop off of these pollutants. During the fall, scheduled pickups occur to account for the uptick in yard waste.

DPW primarily utilizes social media to inform the public of their collection and drop off services.

The Anacostia River Clean Up and Protection Fertilizer Act of 2012 established rules for homeowners, lawn care professionals, and retailers/distributors on the use and distribution of phosphorous based lawn fertilizers. DOEE inspectors focus on the fertilizer distributors, other entities inspect the lawn care providers. At random, fertilizer retailers are inspected and instructed to post signage informing patrons of the fertilizer's chemical makeup. Enforcement actions are taken if non-compliance is found during reinspection of the retailer.

The Coal Tar and High PAH (polycyclic aromatic hydrocarbon) Pavement Sealant Ban establishes rules for contractors, property owners, and businesses/distributors on the use of coal tar pavement products and PAH products. In general, DOEE inspectors select sites where known pavement work has been done. If the property is not in compliance with the Coal Tar and High PAH Pavement Sealant Ban, a Notice of Violation (NOV) is issued and if compliance actions are not taken within a designated amount of time, a daily fine of up to \$2,500 is implemented starting on the date of noncompliance.

TARGETED POLLUTANT CONTROLS SITE VISIT SPECIFIC OBSERVATIONS

Permit Part 3.7.1.1 states that the Permittee shall “continue to attain the capture, prevention, or removal of 108,347 pounds of trash annually from the Anacostia River, as determined in the Anacostia River Watershed Trash TMDL, as a specific single-year measure, using a combination of trash traps and other structural controls, clean-ups, hotspot sweeping, skimmer boat activities, and prevention measures (e.g., education and outreach, policies focused on specific types of trash).”

Observation 8: The District uses trash traps throughout the MS4 to capture trash and prevent it from flowing downstream. The traps are located throughout the District in areas with high estimated trash accumulation. The District maintains nine (9) trash traps on the Anacostia River alone. DOEE representatives stated that trash removal efforts in 2020 led to the removal of over 9 million pounds of trash.

Site No. 4: Outfall 999 Trash Trap

Address/Location: 38°57'04.6"N 76°59'07.8"W

Relevant Minimum Control Measure (MCM): Targeted Pollutant Controls

Entry Time: 1:30 PM (EDT) June 19, 2022

Exit Time: 1:45 PM (EDT)

Site Description: The trash trap at Outfall 999 is a method DOEE utilizes to remove trash from the MS4. The trap is inspected by the DOEE but is maintained by DOEE grantees.

Observation 9: The EPA Inspection Team made the following observations at the Outfall 999 trash trap.

- 1) At the time of the inspection, the trash trap at Outfall 999 was inundated with trash and debris, though the inspection was conducted within 24 hours of a heavy rain event (>1 inch) (refer to [Appendix C, Photographs](#))

13 and 15). DOEE representatives stated that the trap had been cleaned out the prior week.

- 2) During the inspection, DOEE representatives stated that they were unsure of a set inspection and grantee maintenance frequency for the trash trap, though the trash trap inspections normally coincide with the outfall inspections.

OPERATION AND MAINTENANCE (O&M) OF STORMWATER CONTROL MEASURES

During the inspection, DOEE representatives provided information on District O&M protocols and procedures for District-owned and non-District stormwater controls (i.e., best management practices (BMPs)). DOEE representatives stated there are approximately 31,000 BMPs within the District's MS4, of which 7,000 are owned and operated by the District, and approximately 4,500 are categorized as green infrastructure. As mentioned earlier, according to the District's 2021 Annual Report, DOEE developed the SGS portal in 2014 to, "help track, manage, review, and inspect stormwater management control measures within the District. The system is also used to manage submission, review, and inspection of Stormwater Management Plans, Erosion and Sediment Control Plans, and Green Area Ratio Plans." The BMP inventory is included in the SGS portal, and includes BMP information such as BMP type, latitude/longitude, plan approval date, date installed, applicable watershed, inspection dates/notes, etc.

During the inspection, DOEE representatives stated that staff primarily utilize the 2016 O&M Plan and the 2020 Stormwater Management Plan Guidebook to help improve and implement O&M protocols, policies, guidance, inspections, and other accountability measures for all District-owned and operated stormwater and non-District (private) control practices (refer to [Appendix D, Exhibit 6](#)). The same policies and requirements apply to both District-owned and private controls.

To ensure long-term maintenance of District-owned stormwater controls, the DOEE Inspection and Enforcement Division, Construction and Maintenance Branch performs inspections, and the Watershed Protection Division is responsible for operation and maintenance of District-owned stormwater controls. According to DOEE representatives, the District's inspection goal is to inspect all District-owned stormwater control measures once every three years; however, the District stated that this does not always occur. Some high priority/high potential pollutant facilities like the Fort Totten Solid Waste Disposal Transfer Station are inspected more often.

DOEE staff provided the EPA Inspection Team with a copy of the SOP for the inspection of stormwater BMPs (refer to [Appendix D, Exhibit 7](#)). The SGS portal maintains a standard maintenance schedule depending on the type of control and generates an automatic notification when maintenance is needed. DOEE staff provided their "Quick Guide to Stormwater BMP Inspection and Maintenance Requirements" which outlines a schedule for inspection and maintenance based on BMP type (refer to [Appendix D, Exhibit 8](#)). This schedule coincides with that in the SGS portal.

To facilitate long-term maintenance of privately-owned stormwater controls, the District’s self-inspection and reporting program for private and public owners of stormwater control measures allows the owner to complete their own O&M inspections, if they chose to do so. If a property with a BMP changes ownership, those BMP maintenance and inspection responsibilities transfer with the property deed. DOEE provides the owners with a standard template for documenting and submitting photographs of the BMPs and, at the time of the inspection, was working on a draft standard operating procedure (SOP) and standard inspection forms for the owners to utilize (refer to Appendix D, Exhibit 9). DOEE representatives did not specify how many owners currently self-inspect and report. At the time of the inspection, approximately 1,228 stormwater control measures were enrolled in this program.

For those owners who do not wish to participate in the self-inspection and reporting program, those BMPs are inspected by the Construction and Maintenance Branch. All inspection reports, self or otherwise, are maintained in DOEE’s SGS portal. For enforcement of privately-owned stormwater controls, DOEE relies primarily on District of Columbia law and 21 DCMR, Chapter 5 and comparing conditions to the overall site’s stormwater management plan (SWMP). Enforcement measures for potential noncompliance include notices of violation (NOVs) and escalating enforcement measures. The 2021 Annual Report states that in 2021, there were:

- “4,128 inspections for Erosion and Sediment Control;
- 2,014 inspections for Stormwater Management Plan compliance;
- 178 compliance problems identified, including complaint investigation for land disturbances; and
- 178 enforcement actions, including three Supreme Court orders, 52 NOIs, and 123 NOVs. All 178 problems were resolved.”

STORMWATER CONTROL MEASURES/MUNICIPAL OPERATIONS/FACILITIES VISITED

Site No. 5: DPW NE Fleet Parking and Storage Facility (DCR05J00M)

Address/Location: 1900 Fenwick St NE, Washington, DC 20002

Relevant Minimum Control Measure (MCM): Operation and Maintenance (O&M) of Stormwater Control Measures

Entry Time: 8:40 AM (EDT) July 19, 2022

Exit Time: 10:05 AM (EDT)

Site Description: The DPW NE Fleet Parking and Storage Facility site (hereinafter, Storage Facility or Facility) is primarily used to store District salt and snow trucks. Vehicles are washed at a designated wash rack that discharges to the combined sewer system (CSS). A contractor performs minor vehicle maintenance (e.g., oil/tire changes) onsite in an area where any potential spills can be controlled. The Facility is covered under the National Pollutant Discharge Elimination System (NPDES) Multisector General Permit for Stormwater Discharges from Industrial Activities (MSGP). The Facility is owned/operated by DPW, but DOEE still inspects and has maintenance activities under Consent Order Docket No. CWA-03-2018-0019DN.

Observation 10: The EPA Inspection Team made the following observations at the Storage Facility.

- 1) The EPA Inspection Team observed two (2) stormwater inlets protected by filter socks and filter bags and one (1) trench drain (refer to Appendix C, Photographs 16 through 18). Stormwater is collected by the inlets and directed through two (2) Stormceptors (oil/water separators) to the District MS4.
- 2) The EPA Inspection Team observed approximately four (4) oil stains (including evidence of previous spill) and one (1) pool of standing water with an oil sheen at the Storage Facility (refer to Appendix C, Photographs 19 through 23). Facility representatives implemented spill control measures such as absorbent material and absorbent pads on top of two (2) of the more severe oil spills during the inspection (refer to Appendix C, Photograph 23).
- 3) The Facility provided a copy of the SWPPP onsite, dated April 8, 2021, and revised March 29, 2022.
- 4) DOEE representatives provided the EPA Inspection Team with copies of recent maintenance reports from March 2022.
- 5) Facility representatives stated that they conduct daily walkthroughs of the Facility and conduct formal inspections twice a week.

Site No. 6: Fort Totten Solid Waste Disposal Transfer Station (DCR05J00E)

Address/Location: 4900 John McCormack Rd NE, Washington, DC 20011

Relevant Minimum Control Measure (MCM): Operation and Maintenance (O&M) of Stormwater Control Measures

Entry Time: 11:05 AM (EDT) July 19, 2022

Exit Time: 12:30 PM (EDT)

Site Description: The Fort Totten Solid Waste Disposal Transfer Station (hereinafter, Transfer Station or Facility) collects trash, recyclables, and bulk items from the District and transports them to landfills or incinerators in Northern Virginia and Maryland. Facility representatives stated that all materials are processed and transported offsite within 24 hours of collection. Hazardous waste and construction materials are prohibited at the Facility.

The Transfer Station comprises a main office, waste storage & loading area, used tire storage, and covered tipping floors/waste storage. The Facility is covered under the NPDES MSGP. The Facility is owned/operated by DPW, but DOEE still inspects and has maintenance activities under Consent Order Docket No. CWA-03-2018-0019DN.

Observation 11: The EPA Inspection Team made the following observations at the Transfer Station.

- 1) Stormwater at the Facility is directed towards stormwater inlets protected by filter fabric and filter socks, trench drains, and curb inlets located throughout the Facility. Stormwater flows from the inlets into two (2) Stormceptors to the District MS4 (refer to Appendix C, Photographs 24 through 29).
- 2) The EPA Inspection Team observed leachate containing petroleum sheen flowing from the Waste Storage & Loading Area (refer to Appendix C,

Photograph 30). The leachate was flowing towards Trench Drain TD-5 in the Facility's north-eastern area. Trench Drain TD-5 was protected by filter fabric and a filter sock, and the leachate appeared to circumvent the filter sock. Trench Drain TD-5 is connected to a Stormceptor which discharges to the District MS4.

- 3) The EPA Inspection Team observed evidence of an illicit discharge from the west Facility exit driveway. The flow originated from the west Facility exit driveway and proceeded to a curb inlet on the south side of the Facility's southern perimeter along Bates Road (refer to Appendix C, Photograph 31). All sources of the potential illicit discharge could not be determined at the time of the inspection, though some of the discharge was coming from an adjacent street sweeper vehicle (refer to Appendix C, Photograph 32). No samples were taken during or after the inspection. Facility representatives placed a filter sock in front of the curb inlet at the time of the inspection (refer to Appendix C, Photograph 33). Additionally, DOEE staff developed an illicit discharge report the same day, and conducted a follow-up inspection on Friday, July 22, 2022, reporting no discharge.
- 4) The Facility had a copy of the SWPPP onsite, dated April 1, 2021. Facility representatives stated that SWPPP updates were being made at the time of the inspection.
- 5) Facility representatives stated that they conduct daily walkthroughs/cleanings of the Facility and conduct formal inspections weekly.

Site No. 7: DDOT Street and Bridge Maintenance Facility (DCR05J00M)

Address/Location: 414 Farragut Street NE, Washington, DC 20003

Relevant Minimum Control Measure (MCM): Operation and Maintenance (O&M) of Stormwater Control Measures

Entry Time: 1:50 PM (EDT) July 19, 2022

Exit Time: 2:50 PM (EDT)

Site Description: The DDOT Street Maintenance Facility (Maintenance Facility or Facility) houses a salt dome; gravel, sand, and asphalt piles; and maintenance vehicles. Vehicle washing and minor vehicle maintenance is performed at the Facility at a designated location by a contractor who uses a vacuum truck to collect the wash water. According to Facility representatives, the Facility does not conduct any fueling activities onsite. Stormwater at the Facility is collected by approximately 12-15 storm drain inlets and a trench drain onsite. Collected stormwater flows through sand filters before discharging to the District MS4. The Facility is covered under the NPDES MSGP. The Facility is owned/operated by DDOT, but DOEE still inspects and has maintenance activities under Consent Order Docket No. CWA-03-2018-0019DN.

Observation 12: The EPA Inspection Team made the following observations at the Street Maintenance Facility.

- 1) The EPA Inspection Team observed oil stains in the vehicle storage area (refer to Appendix C, Photographs 34 and 35).
- 2) The EPA Inspection Team observed three (3) bales of hay at the salt dome's north entrance that did not span the entire length of the entrance (refer to Appendix C, Photograph 36).
- 3) The salt dome's south entrance did not have a door or other containment measure (refer to Appendix C, Photograph 47).
- 4) The EPA Inspection Team observed uncontained piles of sand, gravel, and asphalt (refer to Appendix C, Photographs 38 and 39).
- 5) The EPA Inspection Team observed rivulets on the ground downgradient of the aggregate material piles leading to the two (2) discharge points at the Facility's southeast corner (refer to Appendix C, Photographs 40 and 41). Additionally, the EPA Inspection Team observed un-stabilized piles of sediment downgradient of the rivulets at the points of discharge (refer to Appendix C, Photographs 42 and 43).
- 6) The EPA Inspection Team observed an uncovered and broken bag of concrete mix outside of the Facility's storage garage (refer to Appendix C, Photograph 44).
- 7) The Facility had a copy of the SWPPP onsite, dated October 5, 2021, and last revised May 22, 2022.
- 8) Facility representatives stated that they conduct daily walkthroughs/cleanings of the Facility and conduct formal inspections weekly.

Site No. 8: National Park Service (NPS) Rock Creek Park Maintenance Yard (DCR050001)

Address/Location: 5000 Glover Road NW, Washington, DC 20015

Relevant Minimum Control Measure (MCM): Operation and Maintenance (O&M) of Stormwater Control Measures

Entry Time: 3:20 PM (EDT) July 19, 2022

Exit Time: 4:10 PM (EDT)

Site Description: The Rock Creek Park Maintenance Yard (Maintenance Yard or Facility) stores approximately 15-20 vehicles, mowers, and a salt dome used for maintenance activities at Rock Creek Park. Stormwater is directed to two (2) curb inlets south of the Facility's entrance/exit on the south perimeter. Stormwater flows through an Aqua-Swirl system to remove sediment prior to discharging into Rock Creek. At the time of the inspection, the Facility was in the process of removing their underground storage tanks (USTs) and was installing aboveground storage tanks (ASTs) for gasoline and diesel fuel. The Facility is covered under the NPDES MSGP. The Facility is owned/operated by NPS, but the DOEE still inspects and has maintenance activities under Consent Order Docket No. CWA-03-2018-0019DN.

Observation 13: The EPA Inspection Team made the following observations at the Maintenance Yard.

- 1) The EPA Inspection Team observed petroleum stains on the parking lot outside of the office building, in front of the salt dome, and in the vehicle storage area in the mid-east area of the Facility (refer to Appendix C, Photographs 45 and 46).

- 2) The salt dome's entrance did not have a door or other containment measure (refer to [Appendix C, Photograph 47](#)).
- 3) The EPA Inspection Team observed two (2) uncovered and unlabeled 55-gallon drums in the west area of the Facility (refer to [Appendix C, Photograph 48](#)).
- 4) The EPA Inspection Team observed an uncovered roll-off container containing dried concrete in the southeastern portion of the Facility (refer to [Appendix C, Photograph 49](#)).
- 5) The EPA Inspection Team observed liquid dripping from, and pooling by, a loaded trash truck parked in the southeast area of the Facility (refer to [Appendix C, Photograph 50](#)). The liquid from the trash truck was not collecting in a drip pan or otherwise contained.

Site No. 9: South Capitol Street Salt Dome (DCR05J00H)

Address/Location: 2750 South Capitol St, SE, Washington, DC 20020

Relevant Minimum Control Measure (MCM): Operation and Maintenance (O&M) of Stormwater Control Measures

Entry Time: 10:40 AM (EDT) July 20, 2022

Exit Time: 11:20 AM (EDT)

Site Description: The South Capitol Street Salt Dome (Salt Dome or Facility) stores salt for District use during winter months. Stormwater onsite is directed towards three (3) bioretention areas along the north, east, and south perimeters of the Facility. Stormwater on the north area of the Facility is also directed to a trench drain that directs stormwater to the north bioretention area. The Facility is owned/operated by DPW, but DOEE still inspects and has maintenance activities under Consent Order Docket No. CWA-03-2018-0019DN.

Observation 14: The EPA Inspection Team made the following observations at the Salt Dome.

- 1) The EPA Inspection Team observed a low point along the southwest Facility entrance/exit. The entrance/exit was partially protected by a temporary berm (refer to [Appendix C, Photograph 51](#)). However, Facility representatives stated that stormwater is still discharged from the Facility at this location during heavy rains with the potential to contain any spilled salt from the adjacent parking lot. Facility representatives stated that a permanent asphalt berm is currently being designed to direct stormwater towards the north bioretention area.
- 2) The EPA Inspection Team observed spilled salt on the ground in the western portion of the Facility (refer to [Appendix C, Photograph 52](#)).
- 3) The EPA Inspection Team observed petroleum stains on the Facility's west parking lot where equipment is stored (refer to [Appendix C, Photograph 53](#)).
- 4) The Salt Dome's south entrance did not contain doors or other containment measures. Hay bales were observed inside the salt dome near the south entrance, but they were not in use. The EPA Inspection Team

observed salt on the ground outside the salt dome's south entrance (refer to [Appendix C, Photograph 54](#)).

- 5) The Facility had a copy of the SWPPP onsite, dated April 7, 2021.
- 6) Facility representatives stated that they conduct daily visual inspections during the winter months.

Site No. 10: DPW Impound Lot (DCR05J00D)

Address/Location: 5001 Shepherd Pkwy SW, Washington, DC 20032

Relevant Minimum Control Measure (MCM): Operation and Maintenance (O&M) of Stormwater Control Measures

Entry Time: 12:00 PM (EDT) July 20, 2022

Exit Time: 1:10 PM (EDT)

Site Description: The DPW Impound Lot receives, and stores stolen, towed, and damaged cars from the District. The lot can hold approximately 1,200 cars at one time and was at capacity at the time of the inspection. Cars that need to be claimed are held at the lot for 28 days before the lot sells cars at local auctions or sends them to an auction house in Brandywine, Maryland. The lot stores two (2) forklifts and one (1) tow truck as part of the onsite equipment. The Facility is owned/operated by the Metropolitan Police Department of the District of Columbia (MPD), but the DOEE still inspects and has maintenance activities under Consent Order Docket No. CWA-03-2018-0019DN.

Observation 15: The EPA Inspection Team made the following observations at the DPW Impound Lot.

- 1) The EPA Inspection Team observed a storm drain inlet with a displaced filter sock in the northwest area of the Facility (refer to [Appendix C, Photograph 55](#)). Additionally, a filter sock surrounding a storm drain inlet located in the northwest area of the site had collapsed into the gully surrounding the inlet (refer to [Appendix C, Photograph 56](#)). During the inspection, Facility representatives moved the filter sock out of the gully and around the storm drain inlet.
- 2) The EPA Inspection Team observed approximately ten (10) locations with petroleum stains throughout the impound lot (refer to [Appendix C, Photographs 57 through 59](#)). At one of these locations, a drip pan had been placed below a vehicle (refer to [Appendix C, Photograph 59](#)).
- 3) Stains were observed on Shepherd Parkway SW, the road adjacent to the Facility's entrance/exit, where the Facility also stores vehicles (refer to [Appendix C, Photographs 60 and 61](#)). Facility representatives stated that this is a "federal road" and not included in the SWPPP diagram as part of the Facility.
- 4) The EPA Inspection Team observed unprotected curb inlets on Shepherd Parkway SW east of the Facility's entrance/exit downgradient of vehicles stored on the road by the Facility and oil stains (refer to [Appendix C, Photograph 60](#)).

- 5) The EPA Inspection Team observed approximately eight (8) uncovered burnt rusting cars including two (2) cars with batteries still installed (refer to [Appendix C, Photographs 62 and 63](#)).
- 6) The Facility had a copy of SWPPP onsite, dated April 19, 2021.
- 7) Facility representatives state that they conduct daily visual inspections and report any observed spills to the DOEE.

Site No. 11: DC Village Fuel Site (DCR05J002)

Address/Location: 2 DC Village Ln SW, Washington, DC 20032

Relevant Minimum Control Measure (MCM): Operation and Maintenance (O&M) of Stormwater Control Measures

Entry Time: 1:20 PM (EDT) July 20, 2022

Exit Time: 1:50 PM (EDT)

Site Description: The DC Village Fuel Site has a 7,200-gallon double-walled tank of diesel that fuels District vehicles. Stormwater onsite flows towards the Facility's northwest perimeter and discharges into a bioretention area owned by the Office of the State Superintendent of Education (OSSE) Southwest Terminal. The Facility implements and maintains a sock filter at the discharge point into the bioretention area. The Facility is owned/operated by the DPW, but the DOEE still inspects and has maintenance activities under Consent Order Docket No. CWA-03-2018-0019DN.

Site No. 12: Office of the State Superintendent of Education (OSSE) Southwest Terminal (DCR05J009)

Address/Location: 4 DC Village Ln SW, Washington, DC 20032

Relevant Minimum Control Measure (MCM): Operation and Maintenance (O&M) of Stormwater Control Measures

Entry Time: 1:55 PM (EDT) July 20, 2022

Exit Time: 2:45 PM (EDT)

Site Description: The OSSE Southwest Terminal stores District buses. Stormwater from the bus parking lot's mid-north area is directed to a stormwater inlet in the mid-north area of the parking lot, this stormwater inlet connects to a bioretention area (Bioretention #1) west of the parking lot's west perimeter. Bioretention #1 discharges into the District's MS4. Stormwater from the rest of the bus parking lot is directed either to a bioretention area in the bus parking lot's southwest corner (Bioretention #2) or to the bioretention area east of the bus parking lot (Bioretention #3). Stormwater from the west general parking lot is directed to Bioretention #3. Stormwater from the east general parking lot is directed either to a bioretention area south of the east general parking lot (Bioretention #4) or to the west general parking lot to Bioretention #3. The Facility is owned/operated by the District of Columbia Department of General Services (DGS), but the DOEE still inspects and has maintenance activities under Consent Order Docket No. CWA-03-2018-0019DN.

Observation 16: The EPA Inspection Team made the following observations at the OSSE Southwest Terminal.

- 1) The EPA Inspection Team observed a damaged filter sock adjacent to Bioretention #3 (refer to [Appendix C, Photographs 66 and 67](#)).
- 2) The Facility had a copy of the SWPPP onsite, dated July 20, 2021.