U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Site: MedStar Georgetown University Hospital Medical Surgical Pavilion
Construction Site Address: 3800 Reservoir Road NW, Washington DC, 20007
Mailing Address: 3800 Reservoir Road NW, Washington DC, 20007

Report Prepared on: March 17, 2021 (*Date*) By: Environmental Scientist (PG Environmental) (*Signature*)

Report Final as of: March 18, 2021 (*Date*) By: STACIE PRATT (*Signature*), EPA

Digitally signed by STACIE PRATT
Date: 2021.03.18 11:06:24 -04'00'

General Information

Type of Inspection:	Construction Stormwater
Owner:	MedStar Health
Operator:	MedStar-Georgetown Medical Center, Inc. (d/b/a MedStar Georgetown University Hospital)
Permittee:	MedStar Health
NOI Submittal Date:	March 28, 2018
Date of CGP Coverage:	April 11, 2018
NPDES ID:	DCR10004A
Project Start Date:	April 2, 2018
Estimated Project End Date:	June 20, 2021
Area to be Disturbed (acres):	7.25 (approximately)
Receiving Water and/or MS4:	Potomac River and Blue Plains Wastewater Treatment Plant (WWTP) through the DC Water Combined Sewer System

On-Site Inspection Overview

On January 27, 2021, U.S. Environmental Protection Agency (EPA) contractors, PG Environmental, and representatives from the District of Columbia (DC) Department of Energy & Environment (DOEE) and EPA Region III (hereinafter, EPA Inspection Team) conducted a construction stormwater inspection of the above referenced construction site (hereinafter, site) being facilitated by Clark Construction (hereinafter, Permittee or Clark) as well as DC Water Combined Sewer Overflow Outfall 029 (hereinafter, CSO 029 or outfall) and associated infrastructure.

Inspection Date: January 27, 2021 **Entry Time:** 9:00 AM (EST) **Exit Time:** 1:00 PM (EST)

Unique Project Identifier (UPI): 3ED21WN020A

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Opening Conference

Mr. Jake Albright with PG Environmental presented credentials to the site representatives for Clark Construction and DC Water upon arrival at the site. Mr. Albright explained that the purpose of the inspection was two-part, (1) to observe compliance with EPA's 2017 National Pollutant Discharge Elimination System (NPDES) Construction General Permit (hereinafter, CGP or Permit), and (2) to investigate reported instances of dry weather discharges from the DC Water combined sewer system related to the construction site activity. A copy of the Construction General Permit is provided in Appendix A.

The following personnel participated in the inspection. Refer to Appendix C, Exhibit 1 for a copy of the inspection attendance sign-in sheet.

Name	Title/Affiliation	Telephone
Inspectors:		
Amanda Pruzinsky	Inspector – EPA Region 3	(245-814-5456
Monica Crosby	Inspector – EPA Region 3	(245) 814-5659
Robert Burnett	Environmental Protection Specialist – DC DOEE	(202) 535-1725
Jake Albright	Inspector – PG Environmental (U.S. EPA Contractor)	(703) 956-1957
Taylor Fontaine	Inspector – PG Environmental (U.S. EPA Contractor)	(703) 956-1977
Clark Construction Representatives:		
Casey Collins	Safety Engineer	(240) 374-9219
Ben Lord	VP Field	(202) 345-0869
Kurt Dunmire	Safety	(202) 345-3056
Blair Woodley	Project Engineer	(202) 306-9213
Keena Myers	Senior Safety Manager	(301) 708-8663
DC Water Representatives:		
Chris Spargo	Inspector, Construction Inspection DETS	(202) 213-4689
Craig Fricke	Engineering	(202) 707-2426
Dexter Holmes	Supervisor, Field Inspection DETS	(202) 812-5123
Kevin Tucker	SAM 101 Crew Lead	(202) 735-6349
Salil Kharkar	Senior Vice President, Operations and Engineering	(202) 787-4146

Weather and Precipitation

During the inspection, there were partly cloudy skies and temperatures averaging approximately 38 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and five days prior are provided in the table below. The area did not receive any precipitation during the EPA inspection.

Table 1. Total Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount (inches)[1]
GHCND: USW00013743 – Washington Reagan National Airport, VA	January 22, 2021	0.00
GHCND: USW00013743 – Washington Reagan National Airport, VA	January 23, 2021	Trace
GHCND: USW00013743 – Washington Reagan National Airport, VA	January 24, 2021	0.00
GHCND: USW00013743 – Washington Reagan National Airport, VA	January 25, 2021	0.48
GHCND: USW00013743 – Washington Reagan National Airport, VA	January 26, 2021	0.07
GHCND: USW00013743 – Washington Reagan National Airport, VA	January 27, 2021	0.00

Due to the COVID-19 pandemic, the document review was conducted electronically prior to and after the inspection. The EPA Inspection Team requested documentation from the Permittee and the District of Columbia Water and Sewer Authority (hereinafter, DC Water). The EPA Inspection Team requested the Permittee to provide the Notice of Intent (NOI), the applicable Stormwater Pollution Prevention Plan (SWPPP), most recent copies of the site map, staff training records, inspection records, street sweeping records, sewer bypass pumping documentation, and other applicable site documents. The EPA Inspection Team conducted an offsite review of the documentation regarding compliance with the Permit and implementation of the Permittee's SWPPP.

The EPA Inspection Team requested DC Water to provide engineering plans for CSO 029 and related infrastructure, geographic information systems (GIS) mapping of the construction site and outfall vicinity, inspection records related to CSO 029 and associated infrastructure, and documented correspondence with Clark Construction related to CSO 029 discharge events.

Photographs were taken during the inspection by Mr. Jake Albright and Mr. Taylor Fontaine of PG Environmental and are provided in Appendix B. Supporting documentation is provided in Appendix C.

Description of Construction Site

The construction project involves the construction of a new surgical pavilion for the MedStar Georgetown University Hospital, which is located on the campus of Georgetown University, approximately 0.5 miles north of the Potomac River. The project, which was which was in the first of two planned excavation stages at the time of the inspection, replaces a preexisting parking lot to add a new three-level parking deck with direct access to a new 156-room medical/surgical pavilion. According to the SWPPP, the new below grade space will include over 100,000 square feet (sf) of program space and supply storage (refer to Appendix C, Exhibit 2). The above grade construction will include a new emergency department, surgical suites and recovery rooms, and a roof helipad. Additional greenspace areas are scheduled to be installed over top of below grade building space.

The EPA Inspection Team inspected the associated land disturbance and construction activities on site, erosion and sediment (E&S) controls on the perimeter, and the location of previous sewer bypass operations, permitted by DC Water and operated by Clark Construction. At the time of the inspection, sewer had been completed and Clark was no longer bypass pumping. Three designed construction entrances ("Gates") gave access to the project site along Reservoir Road NW: Gate #1 located at the intersection of 38th Street NW, and Gates #2 and #3 along Reservoir Road NW between 38th Street NW

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

and 37th Street NW. The EPA Inspection Team observed that Gate #1 was used for general access to the site, while Gate #3 served was the entry point for the concrete trucks accessing the onsite batch plant (refer to Appendix B, Photograph 1) and materials hauling in the northeast portion of the site; Gate #2 was used to exit this area. Clark representatives stated that the concrete batch plant was covered under EPA's Multi-Sector General Permit (MSGP).

The EPA Inspection Team also observed the site sedimentation tank, used for holding and settling sediment-laden water pumped out of the excavated pit, prior to release into the DC Water combined sewer system (refer to Appendix B, Photographs 2 through 6). The sedimentation tank was located in the southeast corner of the site.

Permit Requirements and Observations

During the inspection, the EPA Inspection Team observed E&S best management practices (BMPs), areas of disturbance, ongoing construction areas, stormwater discharge points, materials handling and storage areas, construction entrances/exits, the onsite concrete batch plant, stormwater drainage/conveyance areas, and dewatering operations. The EPA Inspection Team made all observations detailed below pursuant to provisions of EPA's 2017 CGP.

Records Observations

As part of this inspection, the EPA Inspection Team reviewed the following documents related to the Permittee's compliance with EPA's 2017 CGP and the project's SWPPP. These are referenced ass exhibits throughout the report where applicable.

- Project SWPPP (prepared April 3, 2018)
- SWPPP Inspection Reports (performed by Clark; July 1, 2020 through January 26, 2021)
- Onsite sedimentation tank specifications
- Site street sweeping records (March 20, 2020 through January 28, 2021)
- DC Water correspondence letter to EPA regarding sewer bypass and dewatering events (January 22, 2021)
- Site groundwater dewatering permit (originally issued by DC Water on April 17, 2019)
- DC Water initial authorization and stop work order for bypass pumping (included on pages 178-179 of the SWPPP)
- DC Water GIS maps of the construction site area
- Various engineering drawings (provided by DC Water) related to CSO 029 and combined sewer infrastructure in the vicinity of the site

Permit Part 4.2 (Frequency of Inspections)

At a minimum, you must conduct a site inspection in accordance with one of the two schedules listed below, unless you are subject to the Part 4.3 site inspection frequency for discharges to sensitive waters or qualify for a Part 4.4 reduction in the inspection frequency:

4.2.1 At least once every seven (7) calendar days; *or*

4.2.2 Once every 14 calendar days *and* within 24 hours of the occurrence of a storm event of 0.25 inches or greater, or the occurrence of runoff from snowmelt sufficient to cause a discharge. To determine if a storm event of 0.25 inches or greater has occurred on your site, you must either keep a properly maintained rain gauge on your site, or obtain the storm event information from a

weather station that is representative of your location. For any day of rainfall during normal business hours that measures 0.25 inches or greater, you must record the total rainfall measured for that day in accordance with Part 4.7.1d.

Observation 1: During the site inspection, Clark representatives stated they inspect the site every 7 days and within 24 hours of a rain event, often conducting inspections at a greater frequency than required by the Permit. Clark representatives further stated that they utilized weather.com for the Washington DC area for evaluating qualifying rain events. The Clark representative believed rain data came from Reagan National Airport. During the post-inspection records review, the EPA Inspection Team reviewed site inspection reports from July 1, 2020 – January 26, 2021 (refer to Appendix C, Exhibit 3). Based on the review of the inspection reports, the EPA Inspection Team observed multiple 14-day or longer gaps in inspection frequency. These include:

- September 3 – 18, 2020
- September 23 – October 8, 2020
- December 30, 2020 – January 14, 2021

There was no documented explanation in the site inspection reports for the gaps.

Permit Part 4.5 (Areas That Must Be Inspected)
During your site inspection, you must at a minimum inspect the following areas of your site:

4.5.1 All areas that have been cleared, graded, or excavated and that have not yet completed stabilization consistent with Part 2.2.14a;
4.5.2 All stormwater controls (including pollution prevention controls) installed at the site to comply with this permit;
4.5.3 Material, waste, borrow, and equipment storage and maintenance areas that are covered by this permit;
4.5.4 All areas where stormwater typically flows within the site, including drainageways designed to divert, convey, and/or treat stormwater;
4.5.5 All points of discharge from the site; and
4.5.6 All locations where stabilization measures have been implemented. You are not required to inspect areas that, at the time of the inspection, are considered unsafe to your inspection personnel.

Observation 2: During the post-inspection records review, the EPA Inspection Team reviewed the site inspection reports provided by the Permittee, as referenced in Observation 1. The EPA Inspection Team observed the inspection reports documented observed issues and structural and non-structural site BMPs but did not reference materials storage or maintenances areas. It is unclear if the Permittee consistently inspects these locations during the site inspections.

During the inspection, the EPA Inspection Team observed aggregate storage along the northeast perimeter of the site, just inside Gate #3 (refer to Appendix B, Photograph 7). The material appeared to be contained and was in active use at the time of the inspection. The EPA Inspection also observed an area being used for

portable toilet washing and maintenance in the southeast portion of the site (refer to Appendix B, Photograph 8).

Permit Part 7.2.4 (Site Map)
Include a legible map, or series of maps, showing the following features of the site:

a. Boundaries of the property;
b. Locations where construction activities will occur, including:
    i. Locations where earth-disturbing activities will occur (note any phasing), including any demolition activities;
    ii. Approximate slopes before and after major grading activities (note any steep slopes (as defined in Appendix A));
    iii. Locations where sediment, soil, or other construction materials will be stockpiled;
    iv. Any water of the U.S. crossings;
    v. Designated points where vehicles will exit onto paved roads;
    vi. Locations of structures and other impervious surfaces upon completion of construction; and
    vii. Locations of on-site and off-site construction support activity areas covered by this permit (see Part 1.2.1c).
c. Locations of all waters of the U.S. within and one-mile down gradient of the site's discharge point. Also identify if any are listed as impaired, or are identified as a Tier 2, Tier 2.5, or Tier 3 water;

Observation 3: During the post-inspection records review, the EPA Inspection Team reviewed the SWPPP and associated site maps (refer to Appendix C, Exhibit 1; page 174 of the SWPPP) provided by the Permittee. It appears the site maps include most features required by the Permit. However, it appears that the maps do not label the locations where materials are stored, though these areas were observed during the site inspection (see Observation 2). Additionally, the site receiving water, the Potomac River is approximately 0.5 miles from the southern boundary of the site. Though the area of the river is depicted on one of the site maps (page 36 of the SWPPP), the receiving water is not labeled.

Permit Part 7.2.8 (Staff Training)
Include documentation that the required personnel were, or will be, trained in accordance with Part 6 of the Permit.

Observation 4: During the post-inspection records review, the EPA Inspection Team reviewed the Permittee's training records (refer to Appendix C, Exhibit 1; page 114-121 of the SWPPP). The Permittee provided documentation of site stormwater team roles/responsibilities and various applicable trainings (July 2021 – present). Additionally, during the site inspection, it appeared Clark representatives were generally knowledgeable about Permit requirements.

Field Observations

Permit Part 1.2.1 (Authorized Stormwater Discharges)

The following stormwater discharges are authorized under this permit provided that appropriate stormwater controls are designed, installed, and maintained (see Parts 2 and 3):

a. Stormwater discharges, including stormwater runoff, snowmelt runoff, and surface runoff and drainage, associated with construction activity under 40 CFR 122.26(b)(14) or 122.26(b)(15)(i);
b. Stormwater discharges designated by EPA as needing a permit under 40 CFR 122.26(a)(1)(v) or 122.26(b)(15)(ii);
c. Stormwater discharges from construction support activities (e.g., concrete or asphalt batch plants, equipment staging yards, material storage areas, excavated material disposal areas, borrow areas) provided that:
    i. The support activity is directly related to the construction site required to have permit coverage for stormwater discharges;
    ii. The support activity is not a commercial operation, nor does it serve multiple unrelated construction sites;
    iii. The support activity does not continue to operate beyond the completion of the construction activity at the site it supports; and Stormwater controls are implemented in accordance with Part 2 and Part 3 for discharges from the support activity areas.

Observation 5: The EPA Inspection Team observed a concrete batch plant on the site between Gates #2 and #3 (refer to Appendix B, Photograph 1). Clark representatives stated that the plant was covered under EPA's Multi-Sector General Permit (MSGP).

Permit Part 1.2.2 (Authorized Non-Stormwater Discharges)

The following non-stormwater discharges associated with your construction activity are authorized under this permit provided that, with the exception of water used to control dust and to irrigate vegetation in stabilized areas, these discharges are not routed to areas of exposed soil on your site and you comply with any applicable requirements for these discharges in Parts 2 and 3:

a. Discharges from emergency fire-fighting activities;
b. Fire hydrant flushings;
c. Landscape irrigation;
d. Water used to wash vehicles and equipment, provided that there is no discharge of soaps, solvents, or detergents used for such purposes;

Observation 6: During the inspection, a portable toilet vendor had recently completed servicing and washing portable toilets in the southeast portion of the site. The EPA Inspection Team observed soapy water on the impervious surface in the servicing area (refer to Appendix B, Photograph 8). Clark representatives stated that the water runs off into the excavated area and collects in one of the sumps. Runoff from the excavated area was being pumped through the sedimentation tank and ultimately into the sanitary sewer (refer to Appendix B, Photographs 2 through 6).

Permit Part 1.3.5 (Prohibited Discharges)
The Permit prohibits the discharge of toxic or hazardous substances from a spill or other release from the site.

Due to the location of the excavation at the site, Clark needed to move existing underground utilities, including combined and sanitary sewers. To accomplish this, Clark worked with DC Water to setup an authorized (by DC Water) bypass pumping operation while new sewer infrastructure could be installed (documented in the SWPPP, page 178; refer to Appendix C, Exhibit 4). The Permittee initiated the temporary bypass on September 16, 2020. The bypass operation moved flow from the existing sewer at Sanitary Sewer Structure 50 (21-inch sewer line located near Gate #1) around the excavation and into DC Water Manhole Structure 2 (located near the southern end of the excavation), which houses a 108-inch combined sewer channel and line and an 18-inch sanitary sewer pipe (located enclosed within the combined sewer channel area) (refer to Appendix B, Photographs 9 through 11).

Observation 7: On October 16, 2020, a citizen complaint was sent to DC Water for an apparent dry weather discharge of sewage at CSO 029 (operated by DC Water). DC Water investigated the complaint on October 19, 2020 and determined the discharge to be the result of the sewer bypass operation at the construction site. Sewage was being bypassed from a sanitary sewer into a CSO outfall pipe, down gradient of the CSO Regulator Structure 47 (located on the site near the intersection of Reservoir Road NW and 38th Street NW). DC Water coordinated with Clark immediately upon discovery to correct the pumping setup to ensure sewage was discharged to the sanitary sewer line, instead of the CSO outfall pipe.

DC Water Regulator Structure 47 controls dry weather sanitary sewer flow, sending it to the Blue Plains WWTP, while allowing high volume combined sewage flows during wet weather events to be discharged directly to the Potomac River through CSO 029 (approximately 0.5 miles away). Since the sewer bypass pumping operation discharged down gradient of Regulator Structure 47, sewage was being discharged during all weather conditions directly to the Potomac River through CSO 029 from September 16, 2020 through October 19, 2020. The volume of sewage discharged during that period was estimated by DC Water to be approximately 9.5 million gallons.

Clark and DC Water representatives stated that DC Water maps for the area were unclear and appeared to show another regulator structure (Structure 46) between Regulator Structure 47 and CSO 029, leading them to believe the bypass operation would be routed to the Blue Plains WWTP. DC Water representatives explained that, Structure 46 had been converted to a stormwater-only structure at some point in the past and flows entering the system between Regulator Structure 47 and CSO 029 discharge directly to the Potomac River. DC Water provided engineering drawings of Structures 46 and 47 to show how they operated (refer to Appendix C, Exhibit 5) as well as an overview map of the infrastructure in the area (refer to Appendix C, Exhibit 6). DC Water also provided a written response and explanation to EPA regarding the event on January 22, 2021 (refer to Appendix C, Exhibit 7).

The EPA Inspection Team inspected Regulator Structure 47 and CSO 029 (refer to Appendix B, Photographs 12 through 19) and did not observe wastewater overflowing the weir or signs of sewage being discharged from the outfall. There appeared to be at least 12 inches of freeboard on the weir in Regulator Structure 47.

Permit Part 1.5 (Posting Notice of Permit Coverage)
You must post a sign or other notice of your permit coverage at a safe, publicly accessible location in close proximity to the construction site. The notice must be located so that it is visible from the public road that is nearest to the active part of the construction site, and it must use a font large enough to be readily viewed from a public right-of-way.

Observation 8: The EPA Inspection Team observed that the Permittee had posted a notice of coverage under EPA's 2017 CGP at an onsite location that was publicly accessible. The notice of coverage was posted outside Gate #1 at the corner of 38th Street NW and Reservoir Road NW (refer to Appendix B, Photographs 20 and 21). The posted coverage information included a contact name and number for information regarding the construction site and to report stormwater pollutants in the discharge, and information on how to obtain a copy of the site's SWPPP.

Permit Part 2.2.4 (Minimize sediment track-out)

a. Restrict vehicle use to properly designated exit points;
b. Use appropriate stabilization techniques at all points that exit onto paved roads.
    i. Exception: Stabilization is not required for exit points at linear utility construction sites that are used only episodically and for very short durations over the life of the project, provided other exit point controls are implemented to minimize sediment track-out;
c. Implement additional track-out controls as necessary to ensure that sediment removal occurs prior to vehicle exit; and
d. Where sediment has been tracked-out from your site onto paved roads, sidewalks, or other paved areas outside of your site, remove the deposited sediment by the end of the same business day in which the track-out occurs or by the end of the next business day if track-out occurs on a non-business day. Remove the track-out by sweeping, shoveling, or vacuuming these surfaces, or by using other similarly effective means of sediment removal. You are prohibited from hosing or sweeping tracked-out sediment into any stormwater conveyance, storm drain inlet, or water of the U.S.

Observation 9: The EPA Inspection Team observed vehicle track-out and deposition of sediment offsite onto Reservoir Road NW at Gate #3 (refer to Appendix B, Photographs 22 and 23). During the inspection, Clark representatives stated that a contractor (Strittmatter) sweeps Reservoir Road NW on an as needed basis when hauling materials, but had not done so yet on the day of the inspection. Additionally, Clark representatives stated that stone is regularly added to the entrance by Gate #3 to help remove sediment from the concrete vehicle tires before they exit the site. The EPA Inspection Team also observed an operator hand sweeping the entrance and Gate #3 (refer to Appendix B, Photograph 7).

During the post-inspection records review, the EPA Inspection Team reviewed street sweeping records for the Permittee contractor for Reservoir Road NW near Gates #1-

3 (refer to Appendix C, Exhibit 8). According to the records, from March 20, 2020 until January 28, 2021, there were 19 recorded street sweeping activities during that period, with an average of 17 days between servicing. Reservoir Road NW was swept on the morning of January 28, 2021 (the day after the inspection). The provided documentation shows the previous sweeping event was December 10, 2020. Clark representatives stated manual sweeping conducted approximately daily.

Permit Part. 2.2.10 (Storm Drain Inlets)
Install inlet protection measures that remove sediment from discharges prior to entry into any storm drain inlet that carries stormwater flow from your site to a water of the U.S., provided you have authority to access the storm drain inlet.

Observation 10: The EPA Inspection Team observed that stormwater inlet sediment controls (inlet sediment filters) had been installed and implemented at multiple location the site (refer to Appendix B, Photographs 24 through 26).

Permit Part 2.3.4 (For washing applicators and containers used for stucco, paint, concrete, form release oils, curing compounds, or other materials)

a. Direct wash water into a leak-proof container or leak-proof and lined pit designed so that no overflows can occur due to inadequate sizing or precipitation;
b. Handle washout or cleanout wastes as follows:
    i. Do not dump liquid wastes in storm sewers or waters of the U.S.;
    ii. Dispose of liquid wastes in accordance with applicable requirements in Part 2.3.3; and
    iii. Remove and dispose of hardened concrete waste consistent with your handling of other construction wastes in Part 2.3.3; and
c. Locate any washout or cleanout activities as far away as possible from waters of the U.S. and stormwater inlets or conveyances, and, to the extent feasible, designate areas to be used for these activities and conduct such activities only in these areas.

Observation 11: The EPA Inspection Team observed three concrete washouts that were nearing capacity (refer to Appendix B, Photographs 27 through 29). The EPA Inspection Team also observed pooled water in the immediate vicinity of the washout located near Gate #3 (refer to Appendix B, Photograph 27). The water did not appear to be leaving the site. Clark representatives stated the washouts are routinely checked, materials are collected and hauled offsite, and the washouts are replaced as needed. Clark representatives stated that if concrete washout issues were noted during inspections, they would be documented in the reports. No issues were documented in the reports reviewed by the EPA Inspection Team.

Permit Part 2.4.1 (Construction Dewatering)
Treat dewatering discharges with controls to minimize discharges of pollutants.

Observation 12: Clark and DC Water representatives explained that on November 5, 2020, a turbid discharge was observed at CSO 029 by a DC Water inspection crew. DC Water investigated and determined that a groundwater dewatering line from the construction site was tied into the combined sewer upstream of the outfall (through a manhole on

the Georgetown campus); this discharge had not been routed through the onsite sedimentation tank. DC Water worked with Clark to immediately redirect the pipe to the onsite sedimentation tank. It is unclear how long the groundwater discharge had been discharged directly to the combined sewer CSO outfall pipe (i.e., not to the sedimentation tank first).

Discharges from the sedimentation tank discharged to the combined sewer down gradient of Regulator Structure 47, and directly to the Potomac River through CSO 029 from April 17, 2019 to December 29, 2020 when sedimentation tank discharges were rerouted to the sanitary sewer out of an abundance of caution.

The groundwater discharge permit issued by DC Water estimated the sedimentation tank to discharged 43,200 gallons per day (gpd) to the combined sewer outfall pipe (refer to Appendix C, Exhibit 9). Refer to Appendix C, Exhibit 10 for a copy of the sedimentation tank specifications. DC Water provided a description the events and corrective actions in a letter to EPA on January 22, 2021 (refer to Appendix C, Exhibit 7).

Closing Conference

After the site walk and inspection, the EPA Inspection Team, led by Mr. Albright, met with Clark and DC Water representatives for a closing conference and shared the EPA Inspection Team's preliminary observations. Mr. Albright reiterated that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after the additional review of materials following the inspection.

The inspection concluded at approximately 1:00 PM (EST).