



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date: 5/1/2024
Regulatory Program: National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Facility Name: Street Alley Cleaning Division Operations Campus Facility
Permittee: DC Department of Public Works
Facility Owner/Operator: DC Department of Public Works
Facility Address: 1831 Fenwick Street, NE, Washington D.C. 20002
Latitude and Longitude: 39.91293°N, 76.98367°W
Permit No.: DCR050000 (Master General Permit)
Site Specific Permit No.: DCR05J00A (No Exposure Certification)
NPDES Permit Effective Date: 05/11/2021 (Applied for Coverage)
NPDES Permit Expiration Date: 02/28/2026
SIC code: 4212
Unique Project #: ECAD-5374

Site/Facility Representative(s):

Melvin Hodges

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List of Attachments:

- Attachment A: 2021 EPA Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity
- Attachment B: Photograph Log
- Attachment C: Notice of Intent (NOI) No Exposure Certification (NEC)
- Attachment D: DC DOEE Inspection Report
- Attachment E: April 8, 2021, Stormwater Pollution Prevention Plan for DPW 1831 Fenwick Street, NE Washington, DC 20002
- Attachment F: 2022 Annual Report for Stormwater Discharges Associated with Industrial Activity Under the NPDES MSGP
- Attachment G: 2023 Annual Report for Stormwater Discharges Associated with Industrial Activity Under the NPDES MSGP

I. INTRODUCTION

On May 1, 2024, representatives from EPA Region 3 and a representative of the DC Department of Energy and Environment ("DOEE") (hereinafter, collectively referred to as "the Inspection Team") arrived at the Department of Public Works (DPW) Street Alley Cleaning Division Operations Campus Facility (hereinafter, "the Facility") in Washington, DC. The purpose of the inspection was to assess the Facility's compliance with EPA's Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity, Permit No. DCR05J00A (hereinafter, the "Permit") and other applicable regulations.

A. Inspection Opening Conference

The Inspection Team arrived at the Plant at approximately 10:00 a.m. for the inspection. The Inspection Team met with the following Facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors			
Peter Gold	USEPA Region 3	215 814 -5236	Gold.Peter@epa.gov
Brian Tolton	USEPA Region 3	215-814-3291	Tolton.Brian@epa.gov
State/Local Inspectors			
Robert Burnett	DC DOEE	202-578-6237	Robert.Burnett@dc.gov
Site/Facility Representatives			
Melvin Hodges	DC DPW	202-740-4996	Melvin.Hodges@dc.gov
Daniele Lawrence	DC DPW	202-345-2497	Daniele.Knight@dc.gov
Amy Morgan	DC DOEE	202-804-8965	Amy.Morgan@dc.gov
Jennifer Duckworth	Tetra Tech	973-378-9115	Jennifer.Duckworth@tetrattech.com
Nicole Schneider	Tetra Tech	703-885-5456	Nicole.Schneider@tetrattech.com
Daniel Dunlap	Tetra Tech	703-851-3283	Daniel.Dunlap@tetrattech.com

Mr. Pete Gold, Mr. Brian Tolton and Mr. Robert Burnett displayed their credentials to the Facility Representatives at the outset of the inspection, and explained the purpose of the inspection was to evaluate the Facility's compliance with the Permit. A copy of the 2021 Permit is provided in Attachment A. The Inspection Team informed the Facility Representatives that any information that the Facility deemed to be confidential business information ("CBI") should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA's CBI procedures.

B. Weather and Precipitation

At the time of the inspection, the weather was partly cloudy skies. No precipitation was experienced during the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2 below.

Table. 2 Precipitation Preceding Inspection¹

Station Name	Date	Precipitation Amount (inches) ²
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/26/2024	Trace
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/27/2024	0.00
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/28/2024	0.05
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/29/2024	0.00
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/30/2024	0.00
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	05/01/2024	0.01

C. Summary of the Plant

The DPW Street and Alley Cleaning facility operates as a staging and storage area for fleet vehicles used for snow and leaf operations, street sweeping, and trash pickup. The approximately 5.83-acre site is comprised of three designated areas: Area 1, Area 2, and Area 3. Area 1 consists of a trailer/office building, employee parking, seasonal mulch storage, and two separate roll-off dumpster locations. Area 2 consists of container storage, fenced storage sheds, vehicle storage (street and alley cleaning vehicles including garbage trucks and snow plows with salt spreaders), maintenance equipment, and the Okie Street equipment lot. Area 3 consists of additional vehicle and equipment storage, and additional roll off dumpsters where contracted waste haulers dispose of their trash. Access to the property is from Fenwick Street NE from the West, and Okie Street NE from the North. Areas 2 and 3 direct flows to the District’s Municipal Separate Storm Sewer System (MS4) .

II. OBSERVATIONS

As part of the inspection, the Inspection Team visually observed Facility conditions and documented those conditions through Photographs.

The Photographs (Attachment B) for this report have been processed using EPA Region 3 's Photograph Management Process. A camera generated file name (e.g., PC050006) is assigned to each Photograph as part of the process. The file names generated by the camera are used to identify each Photograph in the Main Narrative and Photograph Log of this inspection report. Unused Photographs are digitally stored and maintained in the inspection file. Unused Photographs are available upon request.

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

The following section presents the Inspection Team's observations relative to the Facility's Permit requirements.

Permit Requirement

Part 2.1.2.7 of the 2021 MSGP states "You must enclose or cover storage piles of salt, or piles containing salt, used for deicing or other commercial or industrial purposes, including maintenance of paved surfaces, in order to minimize pollutant discharges. You must implement appropriate measures (e.g., good housekeeping, diversions containment) to minimize exposure resulting from adding to or removing materials from the pile..."

Part 6 of the 2021 MSGP states the permittee "...must prepare a SWPPP for your facility before submitting your NOI for permit coverage..."

Page 16 of the 2021 SWPPP states "All salt is stored where it is protected from being exposed to stormwater in a covered area and elevated off the ground or inside"

Observation 01:

The Inspection Team observed two small residual piles of salt on the ground without any observed containment in the fenced section of Area 2. This condition was documented in Photographs 7 and 8 of Attachment B.

Permit Requirement

Section 2.1.2.2. of the 2021 MSGP states the permittee "...must keep clean all exposed area that are potential sources of pollutants. You must perform good housekeeping measures in order to minimize pollutant discharges, including but not limited to..." Section 2.1.2.2.a "Sweep or vacuum at regular intervals or, alternatively, wash down the area and collect and/or treat, and properly dispose of the washdown water..."

Section 2.1.2.4.a. of the 2021 MSGP addresses spill prevention and response and states the facility must "Clean up spills and leaks promptly using dry methods (e.g. absorbents) to prevent the discharge of pollutants;..."

Section 2.1.2.5 of the 2021 MSGP states the permittee "...must minimize erosion by stabilizing exposed soils."

Observation 02:

The Inspection Team observed piles of sediment and spill kit residue throughout Area 3. The sediment and spill kit residue were exposed to precipitation and could potentially migrate to the MS4 system. It appeared that sediment from the site perimeter may also be migrating into Area 3. These conditions are documented in Photographs 14 through 17 of Attachment B.

At the time of the inspection, the Facility was placing hay bails around an exposed area between Area 2 and 3. These conditions are documented in Photographs 3 and 4 of Attachment B.

Permit Requirement

Part 2.1.2.3 of the 2021 MSGP states the permittee "...must maintain all control measures that are used to achieve the effluent limits in this permit in effective operating condition...."

Part 6 of the 2021 MSGP states the permittee "...must prepare a SWPPP for your facility before submitting your NOI for permit coverage...."

Page 16 of the 2021 SWPPP states "Material storage piles are covered with a tarp or awning." and "Tarps are regularly inspected to ensure they are intact and being used and secured properly."

Page 17 of the 2021 SWPPP states "Always keep trash containers closed, covered or tarped and roll-off doors closed."

Observation 03:

The Inspection Team observed a tear in a tarp which was covering cement forms that were used for public garbage pail ballast. The tarp was covering cement forms. This is documented in Photographs 1 and 2 of Attachment B.

At the time of inspection, the roll-off container in Area 2 that was on-site receiving waste did not appear to have a cover or tarp and no cover or tarp was seen in the area in proximity to the container. This is documented in Photographs 11 and 12 of Attachment B.

Permit Requirement

Part 2.1.2.4.d of the 2021 MSGP addresses spill prevention and response and states "Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur."

Part 6 of the 2021 MSGP states the permittee "...must prepare a SWPPP for your facility before submitting your NOI for permit coverage...."

Page 17 of the 2021 SWPPP states "Trash bins, dumpsters, and roll-offs do not have cracks, holes, incorrect labels, or unsealed drain plugs. If any of these issues are observed, it is reported and fixed immediately."

Observation 04:

The Inspection Team observed blue plastic drums in a shed in Area 2, some of which lacked labeling. An empty drum was placed haphazardly above the full drums. The pathway to the drums was not clear of obstructions. The drums were located on a secondary containment

pallet and within a covered shed so that they were not exposed to stormwater and any leaks may be collected by the pallet. The condition at the time of the EPA inspection is documented in Photograph 6 of Attachment B.

Permit Requirement

Section 2.1 of the 2021 MSGP “You must select, design and install, and implement stormwater control measures (including best management practices) to minimize pollutant discharges that address the selection and design considerations in Part 2.1.1, meet the non-numeric effluent limits in Part 2.1.2, meet limits contained in applicable effluent limitations guidelines in Part 2.1.3 and meet the water quality-based effluent limitations in part 2.2.”

Part 3.2.1 of the 2021 MSGP requires the permittee to conduct quarterly visual assessments (QVAs) on a quarterly basis.

Part 3.2.2.5 of the 2021 MSGP requires the permittee to initiate corrective action “Whenever the visual assessment shows evidence of stormwater pollution in the discharge.”

Observation 05:

All the QVAs collected in 2022 and 2023 showed evidence of stormwater pollution in the discharge and the facility initiated corrective actions after each QVA (Attachments F and G). Pages 18 and 19 of the SWPPP require no inlet filter for the trench drains or the sewer inlets. The sewer inlets have stormceptors in them. However, during the site visit, the Inspection Team observed inlet protection on and around the sewer inlets. There was a significant amount of sediment around the inlets. This is documented in Photographs 18 and 20 of Attachment B.

There was no inlet protection around the trench drains.

III. CLOSING CONFERENCE

At the conclusion of the onsite inspection, the Inspection Team met with the Facility Representatives for a closing conference. The Inspection Team shared preliminary observations with the Facility Representatives and requested additional documentation from the Facility. The Inspection Team reiterated that all preliminary observations discussed were not compliance determinations. All preliminary observations shared were subject to further review by EPA 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 EPA reviewed additional materials following the inspection.

The inspection concluded at approximately 11:30 AM (EST).