

Re: Index to Administrative Record - Draft
National Pollutant Discharge Elimination System (NPDES)
NPDES Permit Renewal

NPDES PERMIT NUMBER: DC0000390

PERMITTEE NAME:
Potomac Electric Power Company

MAILING ADDRESS:
Pepco Benning Service Center
3400 Benning Road
Washington D.C. 20019

RECEIVING STREAM:
Anacostia River

The administrative record for this permit, DC0000390, includes the Administrative Record (AR) from the 2021 permit no. DC0000094 which are AR document nos. 1-73. The new or additional documents that were used in the development of this permit start at document number 74 below.

Administrative Record for Permit No. DC0000390	
#	Document Description
1	2000 NPDES Fact Sheet and Permit No. DC0000094. November 17, 2000.
2	2008 NPDES Permit Fact Sheet No. DC0000094. June 19, 2009.
3	2013 Permit Renewal Application for NPDES Permit No. DC0000094 from Pepco Benning Service Center, December 17, 2013.
4	2019 Amended Permit Renewal Application for NPDES Permit No. DC0000094 from Pepco Benning Service Center, September 10, 2019.
5	Acute Whole Effluent Toxicity Test Results, October 7, 2013.

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#	Document Description
6	Pepco Benning Service Center's Stormwater Pollution Prevention Plan. September 23, 2019.
7	Email from Tammy Sanford, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Outfall 003 and hydrostatic tank update. November 5, 2019.
8	Email from Tammy Sanford, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Sampling locations for Outfall 013 and Outfall 101. October 15, 2019.
9	Consent Decree between EPA Region 3 and Pepco for liability under Section 402 of the Clean Water Act. May 19, 2017.
10	Consent Decree between the Washington D.C. Department of Energy and Environment and Pepco for liability under the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, and Liability Act (CERCLA), and under Section 401(a)(2) of the District of Columbia Brownfield Revitalization Act of 2000 (DCBRA). January 10, 2011.
11	Revised Consent Decree between the Washington D.C. Department of Energy and Environment and Pepco for liability under the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, and Liability Act (CERCLA), and under Section 401(a)(2) of the District of Columbia Brownfield Revitalization Act of 2000 (DCBRA). August 17, 2011.
12	Email from Carissa Moncavage, EPA Region 3 to Fariba Mahvi, Pepco Benning Service Center Re: Sampling at outfalls discharging to the District's Municipal Separate Storm Sewer System (MS4). June 6, 2019.
13	Email from Fariba Mahvi, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Update on amended application and Sampling at outfalls discharging to the District's Municipal Separate Storm Sewer System (MS4). July 31, 2019.
14	Email from Edward Tracey, Pepco Benning Service Center to Adion Chinkuyu, DOEE Re: Sampling results for Outfalls 014, 015, 016, 005, 006, 401 that discharge to the District's Municipal Separate Storm Sewer System (MS4). May 19, 2020.
14a	Attachment to email from Edward Tracey, Pepco Benning Service Center to Adion Chinkuyu, DOEE Re: Sampling results for Outfalls 014, 015, 016, 005, 006, 401 that discharge to the District's Municipal Separate Storm Sewer System (MS4). May 19, 2020.

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15	Email from Adion Chinkuyu, District Department of Energy and Environment to Carissa Moncavage, EPA Region 3 Re: Sampling results for Outfalls 014, 015, 016, 005, 006, 401 that discharge to the District's Municipal Separate Storm Sewer System (MS4). June 6, 2020.
16	Email from Tammy Sanford, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Sampling locations for MS4 outfalls. August 5, 2020.
17	PCB Source Tracking and Pollutant Minimization Plan for Pepco Benning Service Center. July 16, 2010.
18	Iron Source Tracking and Pollutant Minimization Plan for Pepco Benning Service Center. July 19, 2010.
19	TMDL Implementation Plan for Pepco Benning Service Center. July 16, 2010.
20	Final Remedial Investigation Report for Pepco Benning Service Center. February 2020.
21	Email from Ed Dunne, District Department of Energy and Environment to Carissa Moncavage, EPA Region 3 Re: District's Phase 3 WIP Planning goals for DC0000094. July 28, 2020.
22	Email correspondences between EPA Region 3, DOEE, and the Chesapeake Bay Program Office Re: D.C. Phase 3 Watershed Implementation Plan. March – April 2020.
23	Email from Chesapeake Bay Program Office to EPA Region 3 Re: Edge of Tide (EOT) versus Edge of Stream (EOS) Wasteload Allocations. 2019 – 2020.
24	Chesapeake Assessment Scenario Tool (CAST) Fact Sheet accessed from the Chesapeake Bay Program Office website at https://cast.chesapeakebay.net/about . Website last accessed, August 2020.
25	Email from Adion Chinkuyu, District Department of Energy and Environment to Carissa Moncavage, EPA Region 3 Re: Background data in the Anacostia River. July 10, 2020.

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26	Email from Adion Chinkuyu, District Department of Energy and Environment to Carissa Moncavage, EPA Region 3 Re: Information on PCB monitoring at Pepco Benning Service Center. July 28, 2020.
27	Email from Adion Chinkuyu, District Department of Energy and Environment to Carissa Moncavage, EPA Region 3 Re: PCB and PAH sampling data and recommendations from DOEE's Remediation Program for Pepco Benning Service Center. August 6, 2020.
28	Email from Apurva Patil, District Department of Energy and Environment to Carissa Moncavage, EPA Region 3 Re: PCB and PAH detections in storm drains at Pepco Benning Service Center. August 7, 2020.
29	U.S. EPA's Method 1668C Chlorinated Biphenyl Congeners in Water, Soil, Sediment, Biosolids, and Tissue by HRGC/HRMS. April 2010.
30	U.S. EPA's Water Quality Standards Handbook, Chapter 5: General Policies on Mixing Zones (EPA 820-B-14-004). September 2014.
31	U.S. EPA's Office of Environmental Justice Fact Sheet obtained from U.S. EPA's Environmental Justice website: https://www.epa.gov/environmentaljustice . Last Accessed May 2020.
32	NPDES Permit Rating Worksheet for DC0000094. August 2020.
33	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Phase 3 WIP inaccuracies. July 14, 2020.
34	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Updated flows for Outfall 013 and Outfall 101. May 29, 2020.
35	DMR data for Pepco Benning Service Center. June 5, 2020.
36	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Updated data for Outfall 013. June 8, 2020.

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#	Document Description
37	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Pepco's Comments on version 1 of draft permit dated May 21, 2020 for DC0000094. June 8, 2020.
38	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Using 7Q10 for DC0000094. June 9, 2020.
39	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Pepco's Reasonable Potential Analysis for DC0000094. June 18, 2020.
40	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Pepco's Reasonable Potential Analysis for DC0000094. July 2, 2020.
41	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Pepco's Comments on version 2 of draft permit dated August 13, 2020 for DC0000094. August 24, 2020.
41a	Attachment to email, comments from Pepco on draft permit version 2. August 24, 2020.
42	Email from Carissa Moncavage, EPA Region 3 to Ed Tracey, Pepco Benning Service Center Re: Acute WET test results. August 20, 2020.
43	EPA Region 3 letter to the Community Action Group (CAG) in Washington, D.C. Re: Reissuance of NPDES Permit No. DC0000094. May 18, 2020.
43a	Attachment to email, EPA letter to the Community Action Group (CAG) in Washington, D.C. May 19, 2020.
44	2009 Clean Water Act Section 401 Certification of DC0000094 from District Department of Energy and Environment. June 1, 2009.
45	D.C. Department of Energy and Environment revised Water Quality Standards, effective May 22, 2020.

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46	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Pepco's Comments on version 3 of draft permit dated September 15, 2020 for DC0000094. September 17, 2020.
46a	Attachment to email, comments from Pepco on draft permit version 3. September 17, 2020.
47	Email from Carissa Moncavage, EPA Region 3 to Ed Tracy, Pepco Benning Service Center Re: Benchmark Monitoring. September 23, 2020.
48	Reasonable Potential Analysis for DC0000094. September 2020.
49	Clean Water Act Section 401 Pre-Filing Meeting Request from EPA Region 3 to DOEE. October 29, 2020.
50	Response from DOEE Re: Clean Water Act Section 401 Pre-Filing Meeting Request from EPA Region 3 to DOEE. November 3, 2020.
51	Clean Water Act Section 401 Certification request letter from U.S. EPA Region 3 to the District of Columbia's Department of Energy and Environment. November 30, 2020.
51a	Email transmittal of Clean Water Act Section 401 Certification request letter from U.S. EPA Region 3 to the District of Columbia's Department of Energy and Environment. November 30, 2020.
52	Clean Water Act Section 401 Certification for NPDES permit no. DC0000094 from the District of Columbia's Department of Energy and Environment.
53	Email from Carissa Moncavage, EPA Region 3 to Community Action Group Members Re: Update on NPDES permit for the Pepco Facility (NPDES Permit No. DC0000094). November 25, 2020.
54	Email from Carissa Moncavage, EPA Region 3 to Community Action Group Re: Public Notice of NPDES Permit No. DC0000094. November 30, 2020.

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#	Document Description
55	Email from Carissa Moncavage, EPA Region 3 to District of Columbia's Department of Energy and Environment Re: Public Notice of NPDES Permit No. DC0000094. November 30, 2020.
56	Email from Carissa Moncavage, EPA Region 3 to Interested Parties Re: Public Notice of NPDES Permit No. DC0000094. November 30, 2020.
57	Verification of public notice for NPDES Permit No. DC0000094 on EPA's website. November 30, 2020.
58	Final Biological Evaluation for NPDES Permit No. DC0000094. December 28, 2020.
59	EPA Region 3 letter to District of Columbia Historic Preservation Office, Re: National Historic Preservation Act No Effect Determination. February 4, 2021.
59a	Email transmittal of EPA Region 3 letter to District of Columbia Historic Preservation Office, Re: National Historic Preservation Act No Effect Determination. March 1, 2021.
60	District of Columbia Historic Preservation Office email acknowledgement of EPA's National Historic Preservation Act No Effect Determination. March 17, 2021.
61	Letter from U.S. Fish and Wildlife Service to U.S. EPA Region 3, Re: Response to Section 7 of the Endangered Species Act consultation request from the Chesapeake Bay Ecological Services Field Office. November 5, 2020.
62	Letter from U.S. EPA Region 3 to Maryland Department of the Environment, re: Clean Water Act Section 401(a)(2) notification. February 4, 2021.
62a	Email correspondence from U.S. EPA Region 3 to Maryland Department of the Environment, re: transmittal of Clean Water Act Section 401(a)(2) notification. February 5, 2021.
63	Letter from U.S. EPA Region 3 to Virginia Department of Environmental Quality, re: Clean Water Act Section 401(a)(2) notification. February 4, 2021.

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63a	Email correspondence from U.S. EPA Region 3 to Virginia Department of Environmental Quality, re: transmittal of Clean Water Act Section 401(a)(2) notification. February 5, 2021.
64	Email from Tammy Sanford, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Pepco's Comments on public notice draft permit. December 29, 2020.
64a	Attachment to email, Pepco comments on the draft permit. December 29, 2020.
64b	Attachment to email, Pepco comments on the draft fact sheet. December 29, 2020.
65	Email transmittal from Adion Chinkuyu, District Department of Energy and Environment to Carissa Moncavage, EPA Region 3 Re: DOEE comments on Pepco draft permit. December 23, 2020.
65a	Attachment to email, DOEE comments on the draft fact permit. December 23, 2020.
66	Email from Ed Tracey, Pepco Benning Service Center to Carissa Moncavage, EPA Region 3 Re: Pepco's oil retention pits. March 2, 2021.
67	Total Maximum Daily Loads of Nutrients/Biochemical Oxygen Demand for the Anacostia River Basin, Montgomery and Prince George's Counties, Maryland and the District of Columbia. Approved April 2008. https://doee.dc.gov/publication/anacostia-river-nutrients-and-biochemical-oxygen-demand-bod-tmdl .
68	Total Maximum Daily Loads of Sediment/Total Suspended Solids for the Anacostia River Basin, Montgomery and Prince George's Counties, Maryland and the District of Columbia. Approved July 24, 2007. https://doee.dc.gov/node/14362
69	Total Maximum Daily Loads For Organics and Metals in the Anacostia River, Fort Davis Tributary, Fort Dupont Creek, Fort Stanton Tributary, Hickey Run, Nash Run, Popes Branch, Texas Avenue Tributary, and Watts Branch. Approved August 2003. https://doee.dc.gov/node/12652
70	Total Maximum Daily Loads of Polychlorinated Biphenyls (PCBs) for the Tidal Portions of the Potomac and Anacostia Rivers in the District of Columbia, Maryland, and

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	Virginia. Approved 2007. https://doee.dc.gov/publication/tidal-potomac-and-anacostia-rivers-pcb-tmdl
71	Chesapeake Bay TMDL. Established December 29, 2010. https://www.epa.gov/chesapeake-bay-tmdl/chesapeake-bay-tmdl-document
72	Email from EPA Region 3 to DOEE Re: Reissuance of Pepco NPDES permit no. DC0000094. April 19, 2021.
73	Email from EPA Region 3 to Interested Parties, Re: Reissuance of Pepco NPDES permit no. DC0000094. April 28, 2021.
74	2021 NPDES Fact Sheet and Permit No. DC0000094. April 11, 2021.
75	2021 NPDES Final Permit No. DC0000094. April 11, 2021.
76	2022 Permit Application for NPDES Permit No. DC0000390 from Pepco Benning Service Center, December 7, 2022.
76a	Email transmission of 2022 Permit Application for NPDES Permit No. DC0000390 from Pepco Benning Service Center, December 7, 2022.
77	Application complete letter from EPA Region 3 to Pepco Benning Service Center. January 1, 2022.
78	Email from Pepco Benning Service Center to EPA Region 3, re: land sale. July 18, 2022.
79	Email from Pepco Benning Service Center to EPA Region 3, re: firefighting activity defined. March 18, 2023.

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#	Document Description
80	Mixing Zone Study for Outfall 101. March 24, 2023.
81	Comments on Pepco's mixing zone study from the District of Columbia Department of Energy and Environment (DOEE). June 16, 2023.
82	Email from Pepco Benning Service Center to EPA Region 3, re: updated modeling results. July 5, 2023.
83	Updated/revised mixing zone study for Outfall 101. July 3, 2023.
83a	Letter from Pepco Benning Service Center to EPA Region 3, re: Updated/revised mixing zone study for Outfall 101. July 13, 2023.
84	Pepco Benning Service Center response to EPA's questions on the mixing zone study. September 15, 2023.
85	Pepco Benning Service Center's response to EPA questions, re: mixing zone study. September 15, 2023.
86	Email from Pepco Benning Service Center to EPA Region 3, re: updated diagrams on the mixing zone study. September 18, 2023.
87	Updated mixing study for Outfall 101. September 15, 2023.
88	Email from Pepco Benning Service Center to DOEE, re: response to DOEE's comments on mixing zone study. July 10, 2023.
88a	Attachment to email from Pepco Benning Service Center to DOEE, re: response to DOEE's comments on mixing zone study. July 10, 2023.

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#	Document Description
89	Email from DOEE to Pepco Benning Service Center, re: comments on updated mixing study. July 27, 2023.
90	Email from EPA Region 3 to Pepco Benning Service Center, re: questions about low flows. November 28, 2023
91	Pepco responses to EPA Region 3 questions about low flows. December 12, 2023.
92	40 CFR § 121.5 Pre-filing meeting request from Pepco Benning Service Center to DOEE. April 20, 2023.
93	Clean Water Act Section 401 certification request from Pepco Benning Service Center to DOEE. June 16, 2023.
94	Reasonable period of time letter per 40 CFR § 121.6(b) from EPA Region 3 to DOEE. June 28, 2023.
95	Clean Water Act Section 401 certification for NPDES Permit no. DC0000390 from DOEE to Pepco Benning Service Center. August 28, 2023.
95a	Email transmission of 401 certification for NPDES Permit no. DC0000390 from DOEE to Pepco Benning Service Center. August 28, 2023.
96	Clean Water Act Section 401(a)(2) notification letter from EPA Region 3 to Maryland Department of the Environment (MDE) for NPDES Permit no. DC0000390. September 27, 2023.
96a	Email transmission of Clean Water Act Section 401(a)(2) notification letter from EPA Region 3 to MDE for NPDES Permit no. DC0000390. September 27, 2023.
97	Clean Water Act Section 401(a)(2) notification letter from EPA Region 3 to the Virginia Department of Environmental Quality (VADEQ) for NPDES Permit no. DC0000390. September 27, 2023.

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97a	Email transmission of Clean Water Act Section 401(a)(2) notification letter from EPA Region 3 to the Virginia Department of Environmental Quality (VADEQ) for NPDES Permit no. DC0000390. September 27, 2023.
98	Reasonable Potential Analysis for NPDES Permit no. DC0000390. February 29, 2024.
99	DOEE comments on Pepco Benning Service Center pre-public notice draft permit. April 26, 2023.