

# District of Columbia NPDES Compliance Monitoring Strategy Federal Fiscal Year 2015

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## Proposed Compliance Monitoring Strategy

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### Core Program and Wet Weather Sources

# **NPDES Compliance Monitoring Strategy Federal Fiscal Year 2015 End of Year Report**

## **Introduction:**

The United States Environmental Protection Agency (US EPA) Region III Office of National Pollutant Discharge Elimination System (NPDES) Permits and Enforcement presents the *NPDES Compliance Monitoring Strategy (CMS) Federal Fiscal Year 2015 End of Year Report* template. The intent of this document is to assist each State with reporting compliance monitoring activities as they are described within the October 17, 2007 Compliance Monitoring Strategy (CMS). The CMS reporting template provides EPA's State partners with a consistent format for end of year reporting on compliance monitoring activities conducted during the 2015 Federal Fiscal Year, October 1, 2013-September 30, 2015. US EPA requests that each state complete and submit the NPDES CMS FY 2015 End of Year Report to EPA **by December 30, 2015**.

## **CMS Template Instructions:**

- 1) Refer to your State/Commonwealth's 2015 Compliance Monitoring Strategy which was due October 31, 2013 and insert the corresponding values to the columns for *Universe of Facilities* and *FY 2015 State Inspection Commitments* of facilities and inspection commitments.
- 2) Populate the *FY2015 State Inspections Completed* column with the numbers of completed compliance monitoring activities for each Sector of the Core NPDES Program and the Wet Weather Programs.
- 3) Using the Notes/Comments section, briefly address discrepancies related to FY 2015 compliance monitoring commitments and the final totals for FY 2015 inspections completed by the state.
- 4) Submit the FY 2015 CMS End of Year Report to the EPA Region III, Office of NPDES Permits and Enforcement by December 30, 2015.

## District of Columbia FY 2015 NPDES Core Program Proposed Compliance Monitoring Strategy

### 1.A Major Permittees

<b>Majors</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>1.A.1. 100% of Major permittees should receive at least one Comprehensive inspection once every two (federal fiscal) years. (50% per year)</b>	<b>5</b>	<b>4</b>	
<b>Notes/Comments:</b> EPA inspects DC MS4 Major NPDES Permit DC0000221. DDOE WQD is scheduled to conduct CEI's for DC0000019 (4/15), DC0000094 (4/15), DC0022004 (5/15) and DC0021199 (9/15)			

### 1.B Minor Permittees

<b>Minors</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>1.B. Traditional Minors should receive one inspection every five years. For minors that discharge to a 303d listed water body a Comprehensive inspection should be conducted. In addition, the total number of Comprehensive inspections for all traditional Minors should be 5% of the total.</b>			
<b>1.B.b. "Traditional" minors that discharge to CWA Section 303(d) and 305(b) listed waters.</b>	<b>6</b>	<b>3</b>	
<b>1.B.a. "Traditional" minor permittees that do not discharge to water bodies listed on the CWA Section 303(d) list of impaired waters.</b>			
<b>Notes/Comments:</b> DDOE WQD is scheduled to conduct CEI's for DC0000337(11/14), DC0000035 (5/15) and DC0000175 (6/15)			

### **1.C.1&2 Pretreatment Audits/PCIs**

<b>Approved Pretreatment Program Cities</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>1.C.1. Conduct one Pretreatment Audit every five years. The audit should include at least two oversight inspections of the Approved Program city performing industrial inspections.</b>	<b>1</b>	<b>None (conducted by EPA)</b>	<b>N/A</b>
<b>1.C.2. Conduct two Pretreatment Compliance Inspections (PCIs) every five years. PCIs should not be conducted in the same year that a Pretreatment Audit is conducted.</b>	<b>1</b>	<b>None (conducted by EPA)</b>	<b>N/A</b>
<b>Notes/Comments:</b>			

### **1.C.3 Significant Industrial User Inspections**

<b>Industries Outside Program Cities</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>1.C.3. Conduct an annual inspection, with sampling as appropriate.</b>	<b>0</b>	<b>N/A</b>	<b>N/A</b>
<b>Notes/Comments:</b>			

### **1.E Biosolids**

<b>Major Municipals</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>1.E. Conduct one Sludge inspection every five years. May be done in conjunction with compliance inspections (CEIs, CSIs).</b>		<b>N/A</b>	<b>N/A</b>
<b>Minor Municipals</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>1.E.(i). Minor Municipals that dispose of sludge by land application should have one sludge inspection performed once every five years. The Sludge inspection may be done in conjunction with compliance inspections, Comprehensive or non-Comprehensive.</b>		<b>N/A</b>	<b>N/A</b>
<b>Notes/Comments:</b>			

# District of Columbia FY 2015 Wet Weather Programs Inspection Proposed Compliance Monitoring Strategy

## **2.A. Combined Sewer Systems**

<b>Major Municipals</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.A. Conduct a CSO inspection of of Majors having a combined sewer system once every three years. (Can be done in conjunction with compliance inspections).</b>	<b>1</b>	<b>N/A</b>	<b>N/A</b>
<b>Minor Municipals</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.A.(i). Conduct a CSO inspection of Minors having a combined sewer system once every five years. (Can be done in conjunction with compliance inspections).</b>			
<b>Notes/Comments:</b>			

## **2.B. Separate Sewer Systems**

<b>Major &amp; Minor Municipals</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.B. No set frequency - To be scheduled on an as needed basis. May be conducted in conjunction with compliance inspections (e.g., CIEs, CSIs)</b>	<b>1</b>	<b>N/A</b>	<b>N/A</b>
<b>Notes/Comments:</b>			

## 2.C.1 Municipal Separate Storm Sewer Systems

<b>MS4 Phase 1 Audits</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.C.1.a. Conduct one audit of each MS4 Phase 1 permittee every five years.</b>	<b>1</b>	<b>N/A</b>	<b>N/A</b>
<b>2.C.1.a.(i). Number of MS4 Phase 1 enforcement actions last year FY 2015</b>			
<b>Notes/Comments:</b> Inspection and audit conducted by EPA.			
<b>MS4 Phase 1 Inspections</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.C.1.b. Conduct MS4 Inspections on an as-needed basis.</b>	<b>1</b>	<b>N/A</b>	<b>N/A</b>
<b>Notes/Comments:</b> Inspection and audit conducted by EPA.			
<b>MS4 Phase 2 Inspections and Audits</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.C.1.c. Perform one audit of all MS4 Phase 2 permittees over seven years. Reinspect all facilities within five years.</b>			
<b>2.C.1.c.(i). Number of MS4 Phase 2 enforcement actions last year</b>			
<b>2.C.1.c.(i). Number of facilities inspected 5 years ago (FY2010)</b>			
<b>Notes/Comments:</b>			

## 2.C.3 Construction Stormwater

<b>Phase 1 (greater than 5 acres) Construction Stormwater Inspections</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.C.3.a. Inspect at least 10% of permitted sites Phase 1 Constructions SW sites. Priority should be given to those sites that discharge to 303(d) listed waters and high quality waters of the state.</b>	DDOE Watershed Protection Division.	10% of Phase-I sites annually 5% of Phase-II sites annually	Conducted by DDOE Watershed Protection Division
<b>2.C.3.a.(i). Number of Unpermitted Phase 1 Construction SW sites</b>			

Notes/Comments:			
<b>Phase 2 (1 to 5 acres) Construction Stormwater Inspections</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
2.C.3.b. Inspect at least 5% of permitted sites Phase 2 Construction SW sites. Priority should be given to those sites that discharge to 303(d) listed waters and high quality waters of the state.	DDOE Watershed Protection Division.	10% of Phase-I sites annually 5% of Phase-II sites annually	Conducted by DDOE Watershed Protection Division
2.C.3.b.(i). Number of Unpermitted Phase 2 Construction SW sites			
Notes/Comments:			

## **2.C.2 Industrial Stormwater**

<b>Industrial Stormwater Inspections</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
2.C.2. Inspect 10% of permitted Industrial Stormwater facilities. Priority should be given to those sites that discharge to 303(d) listed waters or high quality waters of the state.	<b>41</b>	<b>10% each year; at a minimum once per permit cycle</b>	
Notes/Comments: DDOE plans to inspect six (6) Industrial CEI in FY15			

## **2.D. Concentrated Animal Feeding Operations**

<b>Large and Medium CAFOs with Permits</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
2.D.1. Inspect large and medium CAFOs at least once every five years.	<b>None</b>	<b>N/A</b>	<b>N/A</b>
Notes/Comments:			
<b>Large Unpermitted CAFOs</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
2.D.2. If not inspected to date, all unpermitted Large CAFOs should be inspected within five years to determine if the facility discharges. Thereafter, inspect as needed	<b>None</b>	<b>N/A</b>	<b>N/A</b>

based on the possibility of an unauthorized discharge.			
Notes/Comments:			
<b>Medium Unpermitted AFOs</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.D.3. Medium AFOs need a one-time assessment to determine size and whether facility discharges.</b>	<b>None</b>	<b>N/A</b>	<b>N/A</b>
Notes/Comments:			
<b>Small AFOs</b>	<b>Universe of Facilities</b>	<b>FY 2015 State Inspection Commitments</b>	<b>FY 2015 State Inspections Completed</b>
<b>2.D.4. Small AFOs should be inspected as needed based on citizen complaint.</b>	<b>None</b>	<b>N/A</b>	<b>N/A</b>
Notes/Comments:			