

EPA EVALUATION OF DISTRICT OF COLUMBIA'S 2014-2015 and 2016-2017 MILESTONES

The U.S. Environmental Protection Agency (EPA) is providing this evaluation of the District of Columbia's progress toward meeting its 2014-2015 milestones and its sector-specific commitments for the 2016-2017 milestone period.

Load Reduction Review

When evaluating 2014-2015 milestone implementation and the 2016-2017 commitments, EPA is comparing progress and commitments to expected pollutant reduction targets to assess whether District-wide and sector load reductions are on track to have practices in place by 2017 that will achieve 60 percent of necessary reductions compared to 2009.

According to the data provided by the District of Columbia for the 2015 progress run¹, the District of Columbia achieved its District-wide load reduction targets for 2015 for all sources combined for nitrogen, phosphorus and sediment. This is largely due to nitrogen, phosphorus and sediment reductions from the wastewater sector. The 2015 progress also shows the District is on track to meet its urban sector load target for phosphorus but is not on track to meet its targets for nitrogen or sediment.

Based on the District's anticipated reductions for nitrogen, phosphorus and sediment during the 2016-2017 milestone period, the District is on track to meet all of its District-wide targets for 2017. Wastewater loads are on track for the 2017 targets for all pollutants. The District is on track to meet its 2017 targets for the urban sector for phosphorus and is off target for nitrogen and sediment in the urban sector. For all three pollutants, the District is anticipated to be on track to meet its Watershed Implementation Plan (WIP) and Chesapeake Bay Total Maximum Daily Load (Bay TMDL) targets by 2025. However, data that is being gathered for the Bay TMDL midpoint assessment could show that changes in levels of effort may be necessary in order to achieve the 2025 targets for all three pollutants.

Urban/Suburban Stormwater – Maintain Ongoing Oversight

2014-2015 Milestone Achievements

- Successfully developed and issued inspections and maintenance protocols for District owned and operated onsite retention practices.
- Developed and tracked impervious surface retrofits on 11th Street Bridge and paving removal rights of way.
- Reported Homeowner Best Management Practice (BMP) implementation starting in 2014 through the National Environmental Information Exchange Network (NEIEN) utilizing protocol approved by the Chesapeake Bay Program (CBP) partnership.
- Acquired, confirmed and submitted 2014 and 2015 BMP implementation from several federal agencies working through the Federal Stormwater Memorandum of Understanding (MOU)².

¹ Loads simulated using 5.3.2 version of the Chesapeake Bay Watershed Model and wastewater discharge data reported by the Bay jurisdictions.

² The DC Federal Stormwater MOU commits the General Services Administration, National Park Service, Department of Defense and EPA to enhanced stormwater management by sharing best practices and approaches to stormwater management.

- Completed follow up inspections for all facilities types within the Municipal Separate Storm Sewer System (MS4) permit area.
- Completed the citywide online stormwater tracking tool.
- Installed 292,068 square feet of green roofs in Fiscal Years 2014 and 2015.

2014-2015 Milestones Missed

- Did not meet retrofit provisions within the MS4 permit. The District appears to be less than 25 percent complete with the MS4 permit retrofit requirement.

2016-2017 Milestones Strengths

- Committed to support green roof installation through direct investment and subsidies.
- Committed to ensure compliance with 2015 Multi-Sector General Permit (MSGP) related to monitoring and record keeping.
- Committed to provide employee training for key personnel at District facilities covered by MSGP.
- Committed to update Quality Assurance Program Plan (QAPP) based on feedback from verification panel and new information on new and existing BMPs as specified in the EPA Chesapeake Bay Program Office 2016 Grant and Cooperative Agreement Guidance.
- Committed to inspect all facilities within MSGP area based upon EPA approved National Pollutant Discharge Elimination System (NPDES) Compliance Monitoring Strategy.
- Committed to ensure compliance of all facilities deemed critical to stormwater pollution, including NPDES-permitted facilities, for the protection of water quality through outreach, education and compliance.
- Committed to inspect all industrial, commercial, institutional, municipal and federal facilities deemed critical sources of stormwater pollution twice within permit cycle.

Key Areas to Address in 2016-2017 Milestone Period

- Given EPA authority for the District's MS4 permit, the District will work with EPA to include a milestone to address anticipated timeframes for completion and implementation of the revised MS4 permit.
- EPA recommends a milestone to address accelerated implementation of retrofit requirements consistent with the MS4 permit.
- EPA recommends a milestone to address developing a fertilizer management demonstration project to document reductions.
- EPA recommends the District develop a specific 2016-2017 milestone to be able to measure progress toward the 2025 WIP goal for urban tree canopy.
- EPA expects the District to provide a milestone to train relevant staff and partners on new verification protocols.

Wastewater Treatment Plants and Onsite Systems – Maintain Ongoing Oversight

2014-2015 Milestone Achievements

- Completed enhanced nutrient removal (ENR) upgrades at Blue Plains Wastewater Treatment Plant (WWTP) which became operational in September 2014, making Blue Plains WWTP the most advanced WWTP of its size in the world and yielding significant nutrient reductions to the Potomac River and the Chesapeake Bay.

2014-2015 Milestones Missed

- None identified.

2016-2017 Milestones Strengths

- None identified.

Key Areas to Address in 2016-2017 Milestone Period

- EPA expects the District to work with EPA to ensure tracking and reporting of green infrastructure practices installed as part of the approved District of Columbia Water and Sewer Authority (DC Water) Long Term Control Plan (LTCP) modification and the upcoming reissued Blue Plains permit.

Offsets and Trading – Maintain Ongoing Oversight

2014-2015 Milestone Achievements

- The District of Columbia Stormwater Management Plan Tracking Database is currently in use and continues to be enhanced to include additional functions.

2014-2015 Milestones Missed

- None identified.

2016-2017 Milestones Strengths

- None identified.

Key Areas to Address in 2016-2017 Milestone Period

- EPA expects the District to continue to work with EPA to develop the sector growth information for the District.
- EPA expects the District to continue to work with EPA to address accounting for growth.

Potential Federal Actions and Assistance

- EPA will work with the District to address potential impacts on schedule and loads to the Chesapeake Bay associated with the green infrastructure controls in the approved DC Water LTCP modification.
- EPA will lead efforts to ensure that Blue Plains WWTP progress data is submitted on schedule.
- EPA will continue to work with the District to improve federal facility BMP reporting from federal facilities and federal lands consistent with pollutant reduction targets for federal facilities.
- EPA will work with the District, other jurisdictions and federal agencies to include implementation on federal facilities in future progress reporting and milestone commitments.