



## **FACT SHEET ADDENDUM**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 3  
1600 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103-2852**

**NPDES Permit No. DC0000094  
Modification No.4**

**The United States Environmental Protection Agency (EPA) is Proposing the Major Modification of a National Pollutant Discharge Elimination System (NPDES) Permit to Discharge Pollutants Pursuant to the Provisions of the Clean Water Act (CWA) For:**

**Pepco Benning Service Center – East**

**FACILITY LOCATION:  
3400 Benning Road NE – East  
Washington, D.C. 20019**

**RECEIVING WATER:  
Anacostia River**

### **ACTION TO BE TAKEN:**

In accordance with 40 CFR §§ 122.62(a)(2) and 122.63(a), EPA is proposing to modify the NPDES permit for Pepco Benning Service Center based on new information that was not available at the time of permit reissuance and to correct typographical errors.

On October 27, 2025, the U.S. Environmental Protection Agency Region 3 (EPA) provided public notice for a major modification of Potomac Electric Power Company's (Pepco) National Pollutant Discharge Elimination System (NPDES) Permit, permit no. DC0000094, for Pepco Benning Service Center – East. EPA solicited public comments on the Draft Major Modification from October 27, 2025 through November 26, 2025. As discussed in more detail in the Fact Sheet, both EPA and the permittee identified errors in the permit that necessitated this permit modification. EPA received no comments during or after the public notice period.

## Summary

On June 30, 2025, the U.S. Environmental Protection Agency Region 3 (EPA) issued a major modification (modification no. 2) for DC0000094. As discussed in more detail in the Fact Sheet and in the Response to Comments to modification no. 2, the modification removed Outfall 101 from the permit and incorporated requirements of the Anacostia Toxics TMDL, which was approved by EPA in March 2024. Since permit modification no. 2 was issued<sup>1</sup>, both EPA and the permittee identified errors in the permit that necessitate this permit modification.

The following sections of the permit are being modified:

### 1. Part I Section B.1

**Change:** Added Arsenic, Chlordane, DDT, Dieldrin, and Heptachlor Epoxide to Table B.1.

**Rationale:** These pollutants were inadvertently put in the table in Section B.3 and Section B.4, which apply only to PAH pollutants.

### 2. Part I Section B.3

**Change:** Removed Arsenic, Chlordane, DDT, Dieldrin, Heptachlor Epoxide from Table B.3 and moved those pollutants to the table in Section B.1.

**Rationale:** The table in Section B.3 is for interim requirements for PAH pollutants with a compliance schedule. Arsenic, Chlordane, DDT, Dieldrin, Heptachlor Epoxide should not have been included in this table because a compliance schedule is not needed for these pollutants; therefore, they were moved to the effluent limits table in Section B.1.

**Change:** The table heading in Section B.3 “Maximum Daily Effluent Limit” was changed to “Maximum Daily Benchmark Concentrations.”

**Rationale:** The intent of the interim limitations listed in the table under Section B.3 is to include the requirements for these pollutants that are in the current permit issued on April 11, 2021. The requirements for these pollutants in the current permit are benchmark monitoring, not effluent limitations.

**Change:** Changed the title of the table to reflect that the interim requirements are for the PAH pollutants only.

**Rationale:** The pollutants in this section are only PAH pollutants in the TMDL and does not include all TMDL pollutants. The heading was changed to clarify that this section does not include all TMDL pollutants, only PAHs.

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<sup>1</sup> Modification no. 2 was issued with an incorrect effective date so EPA issued a minor modification (modification no. 3) to correct this typographical error.

**Change:** Added “but not greater than 0.053 µg/L” to footnote no. 5 to clarify that the minimum level should not exceed 0.053 µg/L.

**Rationale:** The minimum level is the point where compliance is determined for these pollutants. Adding the numeric value of the compliance point adds clarity to this permit requirement. The lab can achieve a minimum level for PAH analysis between 0.050 µg/L and 0.053 µg/L so adding this clarifying language will capture this variation.

**Change:** Added the following at Footnote 4: “If the permittee exceeds an interim benchmark value for PAHs in Part I Section B.3, they are required to initiate a corrective action under Part III Section H, and that requirement shall be satisfied by compliance with the schedule set forth in Part III, Section A.” Adding this footnote changed the footnote numbering throughout Part I, as such, these footnotes were revised accordingly.

**Rationale:** Modification 2 to the permit includes final effluent limitations for PAHs under a compliance schedule. As long as the permittee is meeting the milestones specified in the compliance schedule, no further actions are warranted to address an exceedance of a benchmark value for PAHs during the interim period under Section B.3.

### 3. Part I Section B.4

**Change:** Removed Arsenic, Chlordane, DDT, Dieldrin, Heptachlor Epoxide from Table B.4 and moved it to the table in Section B.1.

**Rationale:** The table in Section B.4 applies when the final requirements for PAHs become effective. Arsenic, Chlordane, DDT, Dieldrin, Heptachlor Epoxide are already effective upon reissuance of modification no. 2 and should not have been included in this table; therefore, they were moved to the effluent limits table in Part I, Section B.1.

**Change:** The following clarifying language was added to Footnote 7 for Section B.4: “But not greater than 0.053 ug/L.”

**Rationale:** The lab can achieve a minimum level for PAH analysis between 0.050 µg/L and 0.053 µg/L so adding this clarifying language will capture this variation.

**Change:** Revised the section title to specify it is only PAH monitoring.

**Rationale:** The pollutants in this section are only PAH pollutants in the TMDL and does not include all TMDL pollutants. The heading was changed to clarify that this section does not include all TMDL pollutants, only PAHs.

### 4. Part I, Section B.5 and B.6

**Change:** The footnotes for Total Phosphorus in Section B.5 and Total Phosphorus and Total Nitrogen in Section B.6 were incorrectly numbered with a “7.” The correct footnote number is “9” for these parameters and was therefore changed accordingly.

**Rationale:** The footnote number was incorrect.

**5. Part I, Section C.13**

**Change:** Added “and Part I.B.4” to this section because this requirement applies to both sections.

**Rationale:** This section applies to both interim and final PAH monitoring requirements which are found in Sections I.B.3 and I.B.4, respectively.

All other provisions in the permit remain unchanged.