

**EPA's Reviews of the District of Columbia's November 14, 2015
Revised Draft BMP Verification Program Plan**

Transmitted January 26, 2016

For your reference and consideration as the District works to further enhance its BMP verification program over the coming two years, please find a compilation of EPA's reviews of the District's November 14, 2015 Revised Draft BMP Verification Program Plan in the form of a series of evaluation forms.

Overarching Comments

Formatting and General Content:

1. The Panel felt that the approach of building a program plan around citations of verification procedures provided in often-lengthy attached appendices was not effective or transparent. The Panel highly recommends pulling out the relevant information (text, tables etc.) from such referenced appendices and placing them directly in the jurisdiction's program plan, and then provide a link to the full document within the program plan's text.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments: The District's review program plan provides the right balance of detailed documentation along with numerous links to other even more detailed documentation.			

Use of Statistical Sampling Approaches and Practice Prioritization:

2. Anytime the jurisdictions select a subsampling percentage—e.g., 5 percent—they should document the process and rationale for how they selected that specific percentage. Simply citing a methodology used by NRCS or other data submitting partners is not sufficient in the Panel’s opinion. Emphasis should be placed on documenting the criteria for subsample selection on how that percent subsampling meets the jurisdiction’s own WIP and verification objectives to ensure they have achieved the Partnership’s BMP Verification Principles.

Was this comment sufficiently addressed?		
Addressed: <input type="checkbox"/>	Partially Addressed: <input checked="" type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments: Limited documentation on the rationale of their 5% and 10% sampling percentages.		

3. When using a statistical sampling based verification protocol (e.g., CTIC), the jurisdiction should clearly document how they plan to translate the findings from the statistical survey into the actual numbers and geographical distribution of practices submitted through NEIEN for crediting through the Partnership’s annual progress runs.

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Comments: Not applicable to the District.		

4. Jurisdictions should consider basing the rigor of their verification protocols by a practice’s contributions to planned pollutant reductions under the jurisdiction’s Watershed Implementation Plans (WIPs). Risk of practice failure may also be a workable means to prioritize verification if clear justification for assignment of risk to individual BMPs is provided.

Was this comment sufficiently addressed?		
Addressed: <input checked="" type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments: The District provides documentation on its priorities for verification by and within individual source sectors.		

5. Jurisdictions should provide the overall percentage of the total WIP load reductions contributed by BMPs that the jurisdiction has included in its BMP verification protocols. Pennsylvania's draft program plan provides good examples of this approach (see page 5 for one example).

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments:

6. While the Panel recommends the prioritization of BMPs, they note that verification protocols must be developed for *all* BMPs that a jurisdiction plans to report. Therefore, the Panel is asking for the jurisdictions to fill in the blanks for any low and medium priority BMPs for which verification protocols have not yet been submitted. The Panel asks for a specific timeframe for providing verification protocols for these low and medium priority BMPs, as well as a description of the envisioned level(s) of verification, recognizing the Basinwide Framework allows for less rigorous levels of verification for these low priority practices.

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: The District discussed in detail those BMPs for which they do not currently have BMP protocols and plans in the future for developing protocols.

7. The Panel requests that all six states describe their proposed verification of septic systems/on-site treatment systems EVEN if those treatment technologies may be low priority and/or if the jurisdiction does not have plans to submit these technologies in the near future for pollutant reduction credit.

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: Not applicable to the District.

Practice Inspections:

8. Training requirements for inspectors were not clearly documented throughout the verification program plans. (See New York’s draft agricultural plan for a good working example of what the Panel was looking for across the jurisdictions.)

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Comments:			

9. The Panel feels that independent, third party review is necessary in most cases to meet the Public Confidence Principle.

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10. If a BMP has been inspected and found to meet standards, then the jurisdiction needs to clearly document their plans to ‘restart the clock’ on that practice and apply a new life span.

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Comments:			

11. If a BMP has been inspected and found not to meet standards, then the jurisdiction needs to clearly document the process for corrective maintenance and the application of a new life span, or alternatively, to remove it from the jurisdiction's tracking data base.

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Comments:			

12. Across the jurisdictions, the way that verification of erosion and sediment control for active construction and stormwater management for post-construction was conflated and/or confusing at times. A clear distinction between the verification approaches for these very different categories of BMPs should be provided.

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Enhancing Existing Programs:

13. If a jurisdiction has not finished issuing all its MS4 permits, the Panel questions relying on MS4 permits for carrying out verification. Jurisdictions must develop a program plan that is consistent with the urban sector guidance, and cannot simply default to MS4 methodologies.

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14. Where Bay TMDL NPDES permit limits are not yet met, a schedule for treatment upgrades and issuance of associated permits should be included in the jurisdictions' wastewater treatment verification sections.

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Comments:		

15. Verification procedures for BMPs owned or operated by Federal agencies, facilities and landowners were essentially absent from the jurisdictions' initial draft BMP verification program plans—this is an issue that needs to be addressed by both the jurisdictions AND their federal agency and facility partners.

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Comments:		

District of Columbia

Forestry (Red)

The only difference between the District of Columbia’s program and the Forestry Workgroup’s verification guidance was the lack of a second inspection within the first 4 years of tree planting, but inspections may be conducted more often for trees, per other guidance not noted in the verification program plan. The District of Columbia needs to clarify this.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: On the table on page 43, the initial inspection frequency is stated as “three times during establishment”—not sure the timeframe of establishment.

The submitted documentation only addressed the flow of urban forestry related BMP data from other agencies and organizations, but nothing about verification.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments:

There is no information on inspection and maintenance of planted trees, which is an issue in District of Columbia because they typically have a high rate of damage.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments:

The District of Columbia relies on urban forestry for an appreciable nitrogen reduction in its WIP, therefore it is a priority BMP and District of Columbia needs to address *how* the practices will be inspected and maintained

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Comments:		

Clarify whether tree plantings are all new plantings vs. replacements.

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The District of Columbia needs to follow the Forestry Workgroup's verification guidance and provide documentation following the formatting suggestions in Table 8 of the Basinwide BMP Verification Framework and the evaluation form (see Appendix A).

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Comments:		

The Panel noted that the District’s draft protocol showed urban tree planting information coming from District agencies and non-governmental organizations (NGOs), and asked that the District show how this was coordinated and verified. Consult the forestry verification guidance for urban forestry practices.

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Comments:			

Does the program rely upon qualified local forestry partners for tracking, reporting, and maintenance for expanded tree canopy practices?

DC’s Protocol should follow the FWG guidance regarding Tree Canopy given their in-depth and active program and the reliance on this practice in their WIP. DC’s Protocol should say what and how verification practices are followed by the organizations from which the District receives its tree information. DC information included in the new Tree Canopy Management Strategy is extensive regarding UFA’s program. There should be hot links to any documents being referenced in the Protocol. DC should complete Table 8 plus add a short explanatory narrative.

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Comments:			

Stream Restoration (Red)

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Was this comment sufficiently addressed?		
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Comments:		

No mention of a checklist for inspections, or any other tool.

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Comments:		

Frequency of inspections were not specified.

Was this comment sufficiently addressed?		
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Comments:		

Please respond to the stream restoration sector questions in the Panel’s evaluation form (see Appendix A).

Was this comment sufficiently addressed?		
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Comments:		

The Panel asked for more specificity of the size of the event that would prompt re-inspection of stream restoration projects.

Was this comment sufficiently addressed?		
Addressed: <input checked="" type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments: Given the plans for yearly inspections, not sure if this comment is relevant.		

Urban Stormwater (Red)

Most of the Panel members were well aware of the strengths of the District of Columbia’s stormwater management programs, but the submitted draft verification QA plan provided no supporting documentation beyond their urban BMP data base.

Was this comment sufficiently addressed?		
Addressed: <input checked="" type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments:		

Federal agencies, facilities and landowners' verification procedures/protocols were essentially absent—this is an issue that needs to be addressed.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments:			

No information is given on legacy BMPs, but District of Columbia is under EPA's MS4 permit and its annual reports are public information.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments:			

Difficult to understand everything this has been documented—the Panel recommended breaking out some of the information into a table format.

Was this comment sufficiently addressed?			
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Comments:			

The Panel recommended building in a system that provides a periodic review of the District's inspection program.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

The Panel asked the District to document the distinction between regulated sites and retrofit sites in terms of their stormwater verification procedures.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

The protocol does needs more detail about the specific field verification methods they will use after practices are initially constructed, which was also noted by the BMP Verification Review Panel.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

The District Department of Energy and Environment (DOEE—formerly DDOE) is allowed to and does submit stormwater retention credit (SRC) BMPs to the Bay Program to count towards the CB TMDL progress its making with Urban Stormwater Runoff in particular. However, according to its stormwater regulations, and many conversations EPA has had with DOEE, those BMPs are to be inspected every three (3) years. The reason for this is that the credit life-cycle is to infinity and beyond (we have issues with that, but that’s not the point here) and so the initial credit has to be re-certified every three years. In order to be re-certified every three years, DOEE inspects those BMPs every three years. Or at least has assured EPA that it would/will/does inspect such BMPs every three years. So for their QA/QC BMP Verification Protocol to say that BMPs are inspected every five years is inaccurate and unacceptable.

Was this comment sufficiently addressed?					
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Comments:					

Wastewater (Red)

One third of the District of Columbia is in a CSS area, governed by an EPA CSO permit. District of Columbia’s melon chart shows zero reductions from CSO; does this mean that no future nutrient/sediment reductions are needed or will occur, or does it mean that D.C. is counting on the permit/long term control plan to be carried out? If the latter, then more information is needed regarding compliance reporting, monitoring and inspections.

Was this comment sufficiently addressed?					
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Comments:					

Many of the Panel members are well aware of the strengths of the District of Columbia's verification and oversight of wastewater treatment, but the initial draft documentation failed to provide any documentation of verification procedures followed.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

WWTP: DOEE briefly stated how Blue Plains WWTP upgrade and CSO LTCP have been carried out and DC water is responsible for the related verification. No detailed references were mentioned. Since QAPP is only at the jurisdiction level, DOEE could address the coordination with DC Water and EPA on this effort and reference some DC Water documentation on Blue Plains data QAQC and the EPA permit.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

CSO: see above

Was this comment sufficiently addressed?			
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Comments:			

Recommend that the District should provide a BMP protocol that specifically addresses the questions in the wastewater part of the BMP Panel evaluation form.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

What parameters are being monitored at each combined sewer outfall?

Was this comment sufficiently addressed?			
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		Not Addressed:	<input type="checkbox"/>
Comments:			

Typically, it is just flow, so how often will they be monitoring and sampling for bacteria, N, P, etc., at each CSO?

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Comments:			

Only point source discharges from treatment plants are included in the verification process. Nothing is mentioned regarding SSOs or the processes in place to remove illicit discharges.

Was this comment sufficiently addressed?			
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Comments:			

Wetlands [Red]

If the District is planning to report any wetlands restoration projects at any acreage, the Panel recommended the District provide answers to the series of wetlands restoration evaluation review questions found on page 52 of the Panel's August 7th report to the Partnership in their revised wetlands verification protocol documentation.

The District confirmed that they have reported on wetland restoration acreages in the past and they plan to do so into the future.

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		Not Addressed:	<input type="checkbox"/>
Comments:			

Format

The DC QAPP for Urban Best Management Practices Database addresses urban stormwater and forestry BMPs. Wastewater data are discussed briefly; this information is reported to NEIEN by MWCOG.

The Urban BMP QAPP includes many elements and activities that fall under *Group A. Project Management* and *Group B. Data Management*. The QAPP is weak in *Group C. Assessments*, and *Group D. Data Validation and Usability* elements.

- Create new sections for *C. Assessments* and *D. Data Validation and Usability* and cover the elements listed in the *Appendix Q Guidance* document.
- Move text from QAPP page 6 under “BMP Verification and Validation” to Group D.2.
- Add Table 8 - *Verification Program Design* for stormwater

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Comments:		

A stand-alone QAPP for wastewater data is recommended.

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Comments:		

Overarching Comments

Formatting and General Content:

16. The Panel felt that the approach of building a program plan around citations of verification procedures provided in often-lengthy attached appendices was not effective or transparent. The Panel highly recommends pulling out the relevant information (text, tables etc.) from such referenced appendices and placing them directly in the jurisdiction's program plan, and then provide a link to the full document within the program plan's text.

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Comments:			

Use of Statistical Sampling Approaches and Practice Prioritization:

17. Anytime the jurisdictions select a subsampling percentage—e.g., 5 percent—they should document the process and rationale for how they selected that specific percentage. Simply citing a methodology used by NRCS or other data submitting partners is not sufficient in the Panel's opinion. Emphasis should be placed on documenting the criteria for subsample selection on how that percent subsampling meets the jurisdiction's own WIP and verification objectives to ensure they have achieved the Partnership's BMP Verification Principles.

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18. When using a statistical sampling based verification protocol (e.g., CTIC), the jurisdiction should clearly document how they plan to translate the findings from the statistical survey into the actual numbers and geographical distribution of practices submitted through NEIEN for crediting through the Partnership's annual progress runs.

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19. Jurisdictions should consider basing the rigor of their verification protocols by a practice's contributions to planned pollutant reductions under the jurisdiction's Watershed Implementation Plans (WIPs). Risk of practice failure may also be a workable means to prioritize verification if clear justification for assignment of risk to individual BMPs is provided.

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20. Jurisdictions should provide the overall percentage of the total WIP load reductions contributed by BMPs that the jurisdiction has included in its BMP verification protocols. Pennsylvania's draft program plan provides good examples of this approach (see page 5 for one example).

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21. While the Panel recommends the prioritization of BMPs, they note that verification protocols must be developed for *all* BMPs that a jurisdiction plans to report. Therefore, the Panel is asking for the jurisdictions to fill in the blanks for any low and medium priority BMPs for which verification protocols have not yet been submitted. The Panel asks for a specific timeframe for providing verification protocols for these low and medium priority BMPs, as well as a description of the envisioned level(s) of verification, recognizing the Basinwide Framework allows for less rigorous levels of verification for these low priority practices.

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:
Comments: DC does not prioritize w/in suite of urban BMPs. Will in 2yr time period

22. The Panel requests that all six states describe their proposed verification of septic systems/on-site treatment systems EVEN if those treatment technologies may be low priority and/or if the jurisdiction does not have plans to submit these technologies in the near future for pollutant reduction credit.

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:
Comments: N/A

Practice Inspections:

23. Training requirements for inspectors were not clearly documented throughout the verification program plans. (See New York’s draft agricultural plan for a good working example of what the Panel was looking for across the jurisdictions.)

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24. The Panel feels that independent, third party review is necessary in most cases to meet the Public Confidence Principle.

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25. If a BMP has been inspected and found to meet standards, then the jurisdiction needs to clearly document their plans to ‘restart the clock’ on that practice and apply a new life span.

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26. If a BMP has been inspected and found not to meet standards, then the jurisdiction needs to clearly document the process for corrective maintenance and the application of a new life span, or alternatively, to remove it from the jurisdiction's tracking data base.

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27. Across the jurisdictions, the way that verification of erosion and sediment control for active construction and stormwater management for post-construction was conflated and/or confusing at times. A clear distinction between the verification approaches for these very different categories of BMPs should be provided.

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29. Where Bay TMDL NPDES permit limits are not yet met, a schedule for treatment upgrades and issuance of associated permits should be included in the jurisdictions' wastewater treatment verification sections.

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30. Verification procedures for BMPs owned or operated by Federal agencies, facilities and landowners were essentially absent from the jurisdictions' initial draft BMP verification program plans—this is an issue that needs to be addressed by both the jurisdictions AND their federal agency and facility partners.

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Please respond to the stream restoration sector questions in the Panel’s evaluation form (see Appendix A).

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Federal agencies, facilities and landowners' verification procedures/protocols were essentially absent—this is an issue that needs to be addressed.

Was this comment sufficiently addressed?		
Addressed: <input type="checkbox"/>	Partially Addressed: <input checked="" type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments:		

No information is given on legacy BMPs, but District of Columbia is under EPA's MS4 permit and its annual reports are public information.

Was this comment sufficiently addressed?		
Addressed: <input type="checkbox"/>	Partially Addressed: <input checked="" type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments:		

Difficult to understand everything this has been documented—the Panel recommended breaking out some of the information into a table format.

Was this comment sufficiently addressed?		
Addressed: <input checked="" type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments:		

The Panel recommended building in a system that provides a periodic review of the District's inspection program.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: DC didn't ask EPA for more oversight and inspection in this report

The Panel asked the District to document the distinction between regulated sites and retrofit sites in terms of their stormwater verification procedures.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: see priorirt

The protocol does needs more detail about the specific field verification methods they will use after practices are initially constructed, which was also noted by the BMP Verification Review Panel.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments:

The District Department of Energy and Environment (DOEE—formerly DDOE) is allowed to and does submit stormwater retention credit (SRC) BMPs to the Bay Program to count towards the CB TMDL progress its making with Urban Stormwater Runoff in particular. However, according to its stormwater regulations, and many conversations EPA has had with DOEE, those BMPs are to be inspected every three (3) years. The reason for this is that the credit life-cycle is to infinity and beyond (we have issues with that, but that’s not the point here) and so the initial credit has to be re-certified every three years. In order to be re-certified every three years, DOEE inspects those BMPs every three years. Or at least has assured EPA that it would/will/does inspect such BMPs every three years. So for their QA/QC BMP Verification Protocol to say that BMPs are inspected every five years is inaccurate and unacceptable.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

Wastewater (Red)

One third of the District of Columbia is in a CSS area, governed by an EPA CSO permit. District of Columbia’s melon chart shows zero reductions from CSO; does this mean that no future nutrient/sediment reductions are needed or will occur, or does it mean that D.C. is counting on the permit/long term control plan to be carried out? If the latter, then more information is needed regarding compliance reporting, monitoring and inspections.

Was this comment sufficiently addressed?			
Addressed:	<input type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

Many of the Panel members are well aware of the strengths of the District of Columbia's verification and oversight of wastewater treatment, but the initial draft documentation failed to provide any documentation of verification procedures followed.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

WWTP: DOEE briefly stated how Blue Plains WWTP upgrade and CSO LTCP have been carried out and DC water is responsible for the related verification. No detailed references were mentioned. Since QAPP is only at the jurisdiction level, DOEE could address the coordination with DC Water and EPA on this effort and reference some DC Water documentation on Blue Plains data QAQC and the EPA permit.

Was this comment sufficiently addressed?			
Addressed:	<input checked="" type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

CSO: see above

Was this comment sufficiently addressed?			
Addressed:	<input type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>
		Not Addressed:	<input type="checkbox"/>
Comments:			

Recommend that the District should provide a BMP protocol that specifically addresses the questions in the wastewater part of the BMP Panel evaluation form.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments:

What parameters are being monitored at each combined sewer outfall?

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments:

Typically, it is just flow, so how often will they be monitoring and sampling for bacteria, N, P, etc., at each CSO?

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments:

Only point source discharges from treatment plants are included in the verification process. Nothing is mentioned regarding SSOs or the processes in place to remove illicit discharges.

Was this comment sufficiently addressed?					
Addressed:	<input type="checkbox"/>	Partially Addressed:	<input type="checkbox"/>	Not Addressed:	<input type="checkbox"/>
Comments:					

Wetlands [Red]

If the District is planning to report any wetlands restoration projects at any acreage, the Panel recommended the District provide answers to the series of wetlands restoration evaluation review questions found on page 52 of the Panel’s August 7th report to the Partnership in their revised wetlands verification protocol documentation.

The District confirmed that they have reported on wetland restoration acreages in the past and they plan to do so into the future.

Was this comment sufficiently addressed?					
Addressed:	<input type="checkbox"/>	Partially Addressed:	<input checked="" type="checkbox"/>	Not Addressed:	<input type="checkbox"/>
Comments:					

Format

The DC QAPP for Urban Best Management Practices Database addresses urban stormwater and forestry BMPs. Wastewater data are discussed briefly; this information is reported to NEIEN by MWCOG.

The Urban BMP QAPP includes many elements and activities that fall under *Group A. Project Management* and *Group B. Data Management*. The QAPP is weak in *Group C. Assessments*, and *Group D. Data Validation and Usability* elements.

- Create new sections for *C. Assessments* and *D. Data Validation and Usability* and cover the elements listed in the *Appendix Q Guidance* document.
- Move text from QAPP page 6 under “BMP Verification and Validation” to Group D.2.
- Add Table 8 - *Verification Program Design* for stormwater

Was this comment sufficiently addressed? Addressed: <input type="checkbox"/> Partially Addressed: <input checked="" type="checkbox"/> Not Addressed: <input type="checkbox"/> Comments:

A stand-alone QAPP for wastewater data is recommended.

Was this comment sufficiently addressed? Addressed: <input type="checkbox"/> Partially Addressed: <input type="checkbox"/> Not Addressed: <input checked="" type="checkbox"/> Comments:

District of Columbia Stream Restoration

The submitted documentation only addressed the flow of stream restoration related BMP data, but nothing about verification.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: DC's BMP document does not mention stream restoration flow and when it is verified.

No mention of a checklist for inspections, or any other tool.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: There are no checklists for inspections of stream BMP's in DC's document.

Frequency of inspections were not specified.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: The frequency of inspections is still not specific for stream BMP's.

Please respond to the stream restoration sector questions in the Panel's evaluation form (see Appendix A).

Was this comment sufficiently addressed?		
Addressed: <input type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input type="checkbox"/>
Comments:		

The Panel asked for more specificity of the size of the event that would prompt re-inspection of stream restoration projects.

Was this comment sufficiently addressed?		
Addressed: <input type="checkbox"/>	Partially Addressed: <input type="checkbox"/>	Not Addressed: <input checked="" type="checkbox"/>
Comments: The size of the event that would prompt of a re-inspection of a project was not defined.		

District of Columbia Wastewater

Evaluation Questions

1. Does program require significant wastewater treatment facilities to monitor and report monthly flows and loads via DMRs?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: **This is a requirement of the Blue Plains NPDES permit which was included as a supporting document.**

2. Does program require significant facilities to submit annual loading reports where trading or general permit conditions apply to a facility and when annual WIP reporting applies?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: **Blue Plains is the only significant facility in DC – no trading has yet been authorized. However, annual load reporting is identified in the plan.**

3. For non-significant wastewater treatment facilities, will NPDES DMR be used to report load reductions from BMPs (i.e. upgrades and offsets of new or expanding facilities)?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: **Report identifies reporting loads from all point sources and using DMR data for annual progress reporting.**

4. Will non-significant facilities be tracked against aggregate waste-load allocations with loads reported annually via the mechanisms documented in the jurisdiction's WIPs?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: Report states that data received from all Point Source facilities, both major and minor, are aggregated into a spreadsheet to calculate loads (both nutrients and sediments) to assess compliance with TMDL wasteload allocations

5. Will Combined Sewer Overflows (CSOs) undergo construction verification to ensure proper design, installation and maintenance?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: This is part of the LTCP implementation, which was included as a supporting document.

6. Are plans in place to ensure that CSOs receive sufficient post-construction monitoring and inspection, and that they are being properly tracked and reported?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: This is part of the LTCP implementation, which was included as a supporting document.

7. Are Onsite treatment system verification procedures based on existing state regulations or do they follow the set of minimum elements for verification based on existing state programs in Delaware (DE), Maryland (MD) and Virginia (VA)?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: *N/A in DC*

8. Are proper checks in place to ensure the design and installation on-site BMP systems will be done and reported by certified service providers and verified in the permitting processes?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: *N/A in DC*

9. Is the frequency of maintenance and inspection of onsite systems annual, or otherwise consistent with the recommendations from Table B-17 of the Onsite Wastewater Treatment Expert Panel report?

Was this comment sufficiently addressed?
Addressed: Partially Addressed: Not Addressed:

Comments: *N/A in DC*

District of Columbia Wastewater

One third of the District of Columbia is in a CSS area, governed by an EPA CSO permit. District of Columbia's melon chart shows zero reductions from CSO; does this mean that no future nutrient/sediment reductions are needed or will occur, or does it mean that D.C. is counting on the permit/long term control plan to be carried out? If the latter, then more information is needed regarding compliance reporting, monitoring and inspections.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: **LTCP implementation is the mechanism for CSO reductions. Don't quite understand zero reduction claim. What was the baseline? LTCP is designed to generate CSO reductions.**

Many of the Panel members are well aware of the strengths of the District of Columbia's verification and oversight of wastewater treatment, but the initial draft documentation failed to provide any documentation of verification procedures followed.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: **Document appears to address oversight of wastewater treatment.**

WWTP: DOEE briefly stated how Blue Plains WWTP upgrade and CSO LTCP have been carried out and DC water is responsible for the related verification. No detailed references were mentioned. Since QAPP is only at the jurisdiction level, DOEE could address the coordination with DC Water and EPA on this effort and reference some DC Water documentation on Blue Plains data QAQC and the EPA permit.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: Supplemental documents, including the EPA permit for Blue Plains, were included.

CSO: see above

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments:

Recommend that the District should provide a BMP protocol that specifically addresses the questions in the wastewater part of the BMP Panel evaluation form.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: Supplemental documents, including the NPDES Compliance Inspection Manual, were included.

What parameters are being monitored at each combined sewer outfall?

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: Although report does not specify parameters being monitored, CSO monitoring is governed by the NPDES permit for Blue Plains and other CSO related documents included as Supplemental documents.

Typically, it is just flow, so how often will they be monitoring and sampling for bacteria, N, P, etc., at each CSO?

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: Refer to the Blue Plains permit and other supporting CSO documents.

Only point source discharges from treatment plants are included in the verification process. Nothing is mentioned regarding SSOs or the processes in place to remove illicit discharges.

Was this comment sufficiently addressed?

Addressed: Partially Addressed: Not Addressed:

Comments: Not aware of SSO issues in DC, although there are portions of the District that are separate sewers which could have potential to for SSOs or illicit discharges. Report does address impervious surface disconnections in the combined and separate sewer areas.

District of Columbia Wetlands

If the District is planning to report any wetlands restoration projects at any acreage, the Panel recommended the District provide answers to the series of wetlands restoration evaluation review questions found on page 52 of the Panel's August 7th report to the Partnership in their revised wetlands verification protocol documentation.

The District confirmed that they have reported on wetland restoration acreages in the past and they plan to do so into the future.

Was this comment sufficiently addressed?

Addressed:

Partially Addressed:

Not Addressed:

Comments:

DOEE will ensure that reporting processes distinguish between wetlands implemented as stormwater BMPs for regulated activities and efforts undertaken to restore habitat where native wetlands have been lost.