Message

From: Moncavage, Carissa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C95C8A8230CA409E86CF22EC30E1666B-MONCAVAGE,]
Sent: 7/10/2020 9:30:21 PM
To: Thomas, John P. (DDOT) [john.pthomas@dc.gov]; Rhones, Aaron (DDOT) [aaron.rhones@dc.gov]
BCC: Stephens, Shana [Stephens.Shana@epa.gov]
Subject: RE: SWPPP link for Washington DC Dept of Transportation NOIs

Hi John,

The three NOIs have been rejected so that changes can be made. Please don't hesitate to contact me if you have any questions on what needs to be revised. Once the revisions are made to the NOI forms you should be able to re-submit them without a problem. One thing I did not specify but is important to identify correctly on the NOI is the 303(d) listings of the receiving waterbodies. Kingman Lake and the Northwest Branch of the Anacostia River are not on the 303(d) list but do have completed TMDLs. Therefore, the NOI forms should reflect the following answers under this section:

> ***Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL?*** No
> ***Has a TMDL been completed for this receiving waterbody?*** Yes

Here are the TMDLs for each waterbody:

Northwest Branch of the Anacostia River TMDLs (Waterbody ID: DCANA00E)
BOD
E. coli
Chlordane
DDD
DDE
DDT
Dieldrin
Heptachlor Epoxide
PAH 1,2,3
PCBs
Arsenic
Copper
Zinc
Total Suspended Solids
Oil and Grease
Nitrogen
Phosphorus

Kingman Lake TMDLs
BOD
E. coli
Chlordane
DDT
PCBs
PAH 1,2,3
Arsenic

Oil and Grease
Total Suspended Solids

Regards,
Carissa Moncavage
NPDES Permits Section
Clean Water Branch
U.S. EPA Region 3, Water Division
(215) 814-5798
(pronouns: she/her)

From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Friday, July 10, 2020 10:22 AM
To: Moncavage, Carissa <Moncavage.Carissa@epa.gov>; Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carissa,

We will make adjustments based on the feedback you provided. We agree it is co-located and sector D makes sense.

I will go into the system to see what is available for me to edit. Thanks!

Thanks,

John Thomas
Chief Performance Officer

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55 M Street S.E. Suite 300,
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From: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Sent: Tuesday, July 7, 2020 4:34 PM
To: Thomas, John P. (DDOT) <john.pthomas@dc.gov>; Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: RE: SWPPP link for Washington DC Dept of Transportation NOIs

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Hi John,

My apologies, I got the first email from 6/23 but somehow missed the second one. I was still waiting for a response related to sectors D and E not realizing you already sent one! It sounds like these sectors would be considered co-located industrial activity, however, the NOIs (DCR05J00L and [Nonresponsive based on revised scope]) list sector D as the primary sector, and the SWPPP lists sector P as the primary sector. Can you clarify the discrepancy between the primary sector listed in the SWPPP and the primary sector listed on the NOI for these two forms?

It doesn't sound like these facilities are manufacturing asphalt paving and roofing materials which would make sector D the primary sector. Instead, there is storage and prep of these materials occuring at the site causing me to think these are co-located sectors. Incidentally, I recently learned that the NOIs can be edited and re-submitted if they were originally submitted before the permit expired. Because these NOIs were submitted before the permit expired, I am going to deny the NOIs so they can be revised and re-submitted. I want to first make sure I understand what information should be included on the forms.

Thanks,
Carissa

From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Tuesday, July 07, 2020 7:21 AM
To: Moncavage, Carissa <Moncavage.Carissa@epa.gov>; Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Good Morning Clarissa,

Just checking to see if you needed anything else here.

Thanks,

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From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Tuesday, June 23, 2020 4:10:45 PM
To: Moncavage, Carissa <moncavage.carissa@epa.gov>; Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carissa,

Some additional information that we were able to get from the group to provide more context.

The NOIs DCR05J00L and [Nonresponsive based on revised scope] are for DDOT's Street and Bridge Maintenance facilities that use asphalt (sector D) and concrete (sector E) to maintain District infrastructure. We designated the facilities as Sector D and E because, although DDOTs operations primarily prepare and apply asphalt and concrete in the field, the materials are stored at the facilities and some material preparation is conducted on site as well. If you feel Sector P would be more appropriate, we are happy to change the sector.

Thanks,

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From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Tuesday, June 23, 2020 2:14:00 PM
To: Moncavage, Carissa <moncavage.carissa@epa.gov>; Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carissa,

Both of these facilities serve as a storage and staging area for the District's street and bridge maintenance operations. Equipment, materials, and trucks are also stored under a covered canopy and in an outdoor storage area. There are stockpiles of milled asphalt, sand, and sand aggregate for this operational activity.

If EPA does not think this activity is related to these two sectors, then we can modify the SWPPP and NOI per your guidance.

Thanks,

John Thomas
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From: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Sent: Tuesday, June 23, 2020 12:27 PM
To: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Cc: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Subject: RE: SWPPP link for Washington DC Dept of Transportation NOIs

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Hi Aaron and John, I meant to say "sector" not "section" in my email. It's unclear how sectors D and E apply to NOIs DCR05J00L and Nonresponsive based on revised scope I didn't see any industrial activity that was related to these two sectors so I'm not sure if they are appropriate for these NOIs. If I am missing something, let me know.

Carissa

From: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Sent: Tuesday, June 23, 2020 11:28 AM
To: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Cc: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carissa, this is Aaron Rhones. To answer your question(s), yes Criterion C forms for Farragut and W street were submitted on January 24, 2020.

Regards,

Sent from my iPhone

On Jun 23, 2020, at 10:28 AM, Moncavage, Carissa <Moncavage.Carissa@epa.gov> wrote:

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Hi John,

The screen shot is sufficient. Let me know if you've looked into the section D and E question I had on DCR05J00L and [Nonresponsive based on revised scope].

Regards,
Carissa

From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Wednesday, June 17, 2020 4:58 PM
To: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Cc: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carrisa,

I can forward the email I sent for the Criterion C forms? Here is the screenshot of the email dated 1-17-20. I will send another email for the Section D and E question.

<image002.png>

Thanks,

John Thomas
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<image003.png>

From: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Sent: Wednesday, June 17, 2020 3:43 PM
To: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Cc: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: RE: SWPPP link for Washington DC Dept of Transportation NOIs

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Thank you for the prompt responses. The Criterion C form must be submitted to EPA a minimum of 30 days prior to submitted the NOI. Was this form already submitted? If so, do you have the date the Criterion C form was submitted to EPA?

Do you have insight to my question about the Sectors D and E that were listed on the NOI?

Thanks again,
Carissa

From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Wednesday, June 17, 2020 2:52 PM
To: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Cc: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carissa,

Some changes after a call with our DOEE team and now have what you need - I hope. See below for corrected version.

DCR05J00L

1. The ESA section on the NOI lists criterion A but the SWPPP includes a criterion C form. Which ESA criterion applies to this discharge?
    a. Criterion C - see the report in the shared SWPPP folder for 1403 W Street NE-
2. The Criterion C form included in the SWPPP indicates the discharge goes to Hickey Run, however, the NOI indicates the discharge goes to the Northwest Branch of the Anacostia River. What is the receiving waterbody for this discharge?
    a. This was confused but in DOEE's Watershed finder the discharge waters is listed as Hickey Run (https://dcgis.maps.arcgis.com/apps/InformationLookup/index.html?appid=a60a0086b47c4e35a638b7a8abe5954f).

3. The USFWS consultation is dated 7/18/2016, according to the USFWS (Chesapeake Bay Ecological Services Field Office) an iPAC evaluation needs to be conducted within the last 90 days of the NOI submission. Please re-evaluate the action area using the USFWS iPAC tool and submit the results to me.
    a. See Attached IPAC result for 1403 W Street NE-

Nonresponsive based on revised scope

One final note (and this might be something you already included but want to make sure), for the Criterion C we have to evaluate both the Fish & Wishlife data (IPAC) and the NOAA data. Per the NOAA data, DC is considered a critical habitat for Atlantic Sturgeon. I have attached the map for reference.

Thanks,

John Thomas
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<image003.png>

From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Wednesday, June 17, 2020 12:53 PM
To: Moncavage, Carissa <moncavage.carissa@epa.gov>
Cc: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carrisa,

Here are the responses to the questions. Here is the shared folder with the SWPPP and the IPAC Reports. We stand ready to address any corrections or follow questions.,

DCR05J00L

1. The ESA section on the NOI lists criterion A but the SWPPP includes a criterion C form. Which ESA criterion applies to this discharge?
    a. Criterion C - see the report in the shared SWPPP folder for 1403 W Street NE
2. The Criterion C form included in the SWPPP indicates the discharge goes to Hickey Run, however, the NOI indicates the discharge goes to the Northwest Branch of the Anacostia River. What is the receiving waterbody for this discharge?
    a. Northwest Branch
3. The USFWS consultation is dated 7/18/2016, according to the USFWS (Chesapeake Bay Ecological Services Field Office) an iPAC evaluation needs to be conducted within the last 90 days of the NOI submission. Please re-evaluate the action area using the USFWS iPAC tool and submit the results to me.
    a. See Attached IPAC result for 1403 W Street NE

Nonresponsive based on revised scope

Thanks,

John Thomas
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<image003.png>

From: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Sent: Tuesday, June 16, 2020 5:33 PM
To: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Cc: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: RE: SWPPP link for Washington DC Dept of Transportation NOIs

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I do have a few questions/comments for your consideration. It's unclear how sectors E and D apply to DCR05J00L and Nonresponsive based on revised scope The SWPPPs for these two sites identify stockpiles of milled asphalt, sand, and sand aggregate but I didn't see anything that indicated the activity associated with these stockpiles. Are these stockpiles stored at the site all the time? How did they/do they get there and what are they used for?

DCR05J00L

1. The ESA section on the NOI lists criterion A but the SWPPP includes a criterion C form. Which ESA criterion applies to this discharge?
2. The Criterion C form included in the SWPPP indicates the discharge goes to Hickey Run, however, the NOI indicates the discharge goes to the Northwest Branch of the Anacostia River. What is the receiving waterbody for this discharge?
3. The USFWS consultation is dated 7/18/2016, according to the USFWS (Chesapeake Bay Ecological Services Field Office) an iPAC evaluation needs to be conducted within the last 90 days of the NOI submission. Please re-evaluate the action area using the USFWS iPAC tool and submit the results to me.

Nonresponsive based on revised scope

Nonresponsive based on revised scope

Let me know if you have any questions.

Thank you,
Carissa

From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Tuesday, June 16, 2020 11:15 AM
To: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Cc: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: Re: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carrissa,

Thanks for the update and yes - you can contact me and Aaron Rhones who is cc'd here so we can be responsive to your needs and questions.

Thanks,

John Thomas
Chief Performance Officer

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<image003.png>

From: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Sent: Tuesday, June 16, 2020 9:38 AM
To: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Cc: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: RE: SWPPP link for Washington DC Dept of Transportation NOIs

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Hi John,

I was able to access the SWPPPs for the three sites listed below. Are you the contact person should I have any questions moving forward?

Thanks,

Carissa

Carissa Moncavage

NPDES Permits Section

Clean Water Branch

U.S. EPA Region 3, Water Division

(215) 814-5798

(pronouns: she/her)

From: Thomas, John P. (DDOT) <john.pthomas@dc.gov>
Sent: Monday, June 15, 2020 3:05 PM
To: Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Cc: Rhones, Aaron (DDOT) <aaron.rhones@dc.gov>
Subject: SWPPP link for Washington DC Dept of Transportation NOIs

Hi Carrisa,

Thanks for taking the time to help me today. Here is the link to the folder that contains all three SWPPPs for the District Department of Transportation.

Here are the names of the three NOIs in the system. If you have any issues please let me know ASAP so I can quickly resolve.

1. DDOT W Street and Bridge Maintenance Facility

Nonresponsive based on revised scope

Thanks,

John Thomas
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For the latest information on the District Government's response to COVID-19 (Coronavirus), please visit coronavirus.dc.gov.