Summary: EPA Evaluation of District of Columbia Draft Watershed Implementation Plan

Rating for Gap-Filling Strategies: **Some Minor Deficiencies**
WIP Numbers Compared to 7/1 and 8/13 Allocations: N 5% and P 3% under; TSS 25% over
Backstop Allocations in Draft TMDL that will remain if final Phase I WIP not strengthened:

- **Minor level backstop allocations** to District of Columbia's wasteload allocations for urban stormwater so that District meets upper range of August 13 sediment allocation. EPA will ensure that all allocations, including sediment, are met through the NPDES permits issued within the District

Overall

- EPA identified some deficiencies in D.C.'s WIP and is recommending only minor backstop allocations. However, several areas for improvement remain in the final WIP
- The DC WIP needs to be more aggressive in addressing urban runoff and should more fully discuss specific commitments with timelines to meet those commitments
- The WIP lists some non-significant wastewater treatment facilities, but does not appear to provide a full list

Urban Stormwater: Some Minor Deficiencies in Gap-Filling Strategies

Key Areas for Improvement and Opportunities for Strengthening Draft WIP

- Neither the WIP input decks submitted for model run nor the WIP document submitted September 1 reflect an aggressive approach for stormwater
- The draft 2010 DC MS4 permit signals an aggressive retention and green infrastructure approach which relies heavily upon infiltration, water harvesting/reuse and evapotranspiration. D.C.'s WIP document should discuss the permit conditions. Further, the WIP input deck should be more consistent with this approach, relying less upon traditional detention- and retention-based approaches
- As the permit writer, EPA will work more closely with D.C. to identify implementation levels consistent with the intent of the draft 2010 D.C. MS4 permit

Wastewater: Some Minor Deficiencies in Gap-Filling Strategies

Key Areas for Improvement and Opportunities for Strengthening Draft WIP

- WIP does not appear to fully list the non-significant point source facilities. EPA and DC should verify that the WIP includes a complete set of non-significant point sources
    - Facilities not identified in the WIP or TMDL will receive a "0" wasteload allocation
- Clarify with EPA, MD and VA that D.C. is setting aside an appropriate allocation for growth at Blue Plains

Federal Facilities: Some Minor Deficiencies in Gap-Filling Strategies

Key Areas for Improvement and Opportunities for Strengthening Draft WIP

- WIP appears to under-identify GSA facilities as well as the potential contribution to meeting allocations
    - EPA recently received updated GIS data from GSA that will share with D.C. prior to submission of final Phase I WIP

- Federal agencies, EPA and D.C. should work together to assess contributions of federal facilities as well as potential actions to address loads from these facilities