

A Report Card for the Phase I Watershed Implementation Plan

Gradesheet for the District of Columbia



## **District of Columbia**

Transparency of Information		Strength of Program Design					
National Pollution Elimination Discharge System (NPDES) Permitting							
Does the WIP disclose the number of facilities within the Bay watershed that are required to have NPDES permits and the number of facilities that have up-to-date NPDES permits in the following sectors: (1) Municipal wastewater facilities (2) Industrial wastewater facilities; (3) Concentrated animal feeding operations; (4) Municipal stormwater within MS4 areas; (5) Industrial stormwater; and	Points 1 1 - 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	For each sector, is the state's NPDES permitting program effective at issuing up-to-date permits for all facilities that require them? 1 point, if 80% of NPDES permits are up-to-date	Points				
<ul><li>(5) Industrial stormwater; and</li><li>(6) Construction outside MS4 areas?</li></ul>	-	4 (1 point/sector x 6 sectors)	1				
Does the WIP contain a schedule with deadlines or other specific qualitative commitments (e.g. x number of permits/month) to reissue and update expired or expiring permits to be consistent with the Bay-wide TMDL and the applicable tributary segment TMDL? Does the WIP disclose the estimated funding and personnel gap between existing and needed resources to ensure the NPDES permitting program is consistent with the Bay-wide TMDL and individual	1	When will the state have all permits updated and rewritten to include the Bay-wide TMDL and individual tributary segment TMDLs? 4 points, by 2016 3 points, by 2018 2 points, by 2020 1 point, by 2022	4				
tributary segment TMDLs? Does the WIP explain how the state will fill	0						
the funding gap and provide a timeline for acquiring the additional funding?	0						
7 points total	5	8 points total	5				

Transparency of Information		Strength of Program Design				
Enforcement of NPDES Permits						
<ul> <li>Does the WIP disclose basic enforcement data, including: <ul> <li>(1) The number of physical, on-site inspections</li> <li>conducted by the state authority in the relevant</li> <li>watersheds during the last year for <ul> <li>a. Municipal wastewater facilities;</li> <li>b. Industrial wastewater facilities;</li> <li>c. Concentrated animal feeding operations;</li> <li>d. Municipal stormwater within MS4 areas;</li> <li>e. Industrial stormwater; and</li> <li>f. Construction outside MS4 areas?</li> </ul> </li> <li>(2) The total number of violations, the number of civil and administrative penalty actions, and the amount of civil and administrative penalty actions, and the amount of civil and administrative penalty actions, and the arount of civil and administrative penalty actions, and the arount of civil and administrative penalties collected in the relevant watersheds during the last year (3)?</li> <li>(3) If local authorities have received delegated authority to conduct local enforcement actions, a narrative description of their enforcement activities</li> <li>(including inspections) for the relevant tributary segments and in the Bay watershed?</li> <li>(4) Enforcement resources for the relevant tributary segments and in the Bay watershed, including personnel and funding?</li> <li>(5) Data on major facilities in the relevant tributary segments and in the Bay watershed funding and personnel gap between existing and needed resources to ensure an effective enforcement program that will lead to compliance?</li> </ul> </li> <li>Does the WIP explain how the state will fill the funding gap and provide a timeline for acquiring the funding gap and provide a timeline for acquiring</li> </ul>	Points 0 0 - 1 0 - 1 0 0 0 0 0 0 0	Does this enforcement information describe an effective, deterrence-based enforcement program for compliance with National Pollution Discharge Elimination System permits? 1 point per sector, if the percentage of inspections is greater than or equal to EPA's guidance a. Municipal wastewater facilities—50% annually; b. Industrial wastewater facilities—50% annually; c. Concentrated animal feeding operations—20% annually; d. Municipal stormwater within MS4 areas—20% annually; e. Industrial stormwater—10% annually; and f. Construction outside MS4 areas—10% annually. 1 point, based on the level of enforcement resources: Inspector-to-permits ratio of 1:400 or less 1 point, if less than 15% of major facilities are in significant non-compliance	Points 0 0 - 1 0 - 0 0 0 0 0 0 0 0 0 0 0 0 0 0			
	0 2	6 points total	1			

Transparency of Information		Strength of Program Design					
Monitoring and Verification for Nonpoint Sources (NPS)							
Does not apply	Points		Points				
Contingencies							
Does not apply							
Concentrated Animal Feeding Operations (CAFOs)							
Does not apply							
	Storm	water					
Does the WIP include copies of stormwater permittees' most recent self-reported disclosures?	0						
Does the WIP disclose, with specificity, how the state or a delegated local authority verifies that such dischargers are meeting permit requirement?	1	Do the local authorities' enforcement efforts amount to an effective deterrence-based enforcement program? 1 point for regular inspection frequency	1				
Does the WIP disclose the estimated funding and personnel gap between existing and needed resources to ensure an effective stormwater NPDES permitting program that is consistent with the Bay-wide TMDL and		1 point for assessment of penalties 1 point for enforcement authority, meaning the local authority has enforcement authority roughly equivalent to the state authority	0				
individual tributary segment TMDLs?	1	1 point for permit coverage rate of greater than 80% of all sites that are required to have permits	1				
Does the WIP explain how the state will fill the funding gap and provide a timeline for acquiring the additional funding?							
4 points total	1	4 points total	3				
Air Deposition							
Does not apply							
Discretionary Points (4 Max)							
	0		0				
Total Points							
	10		9				

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