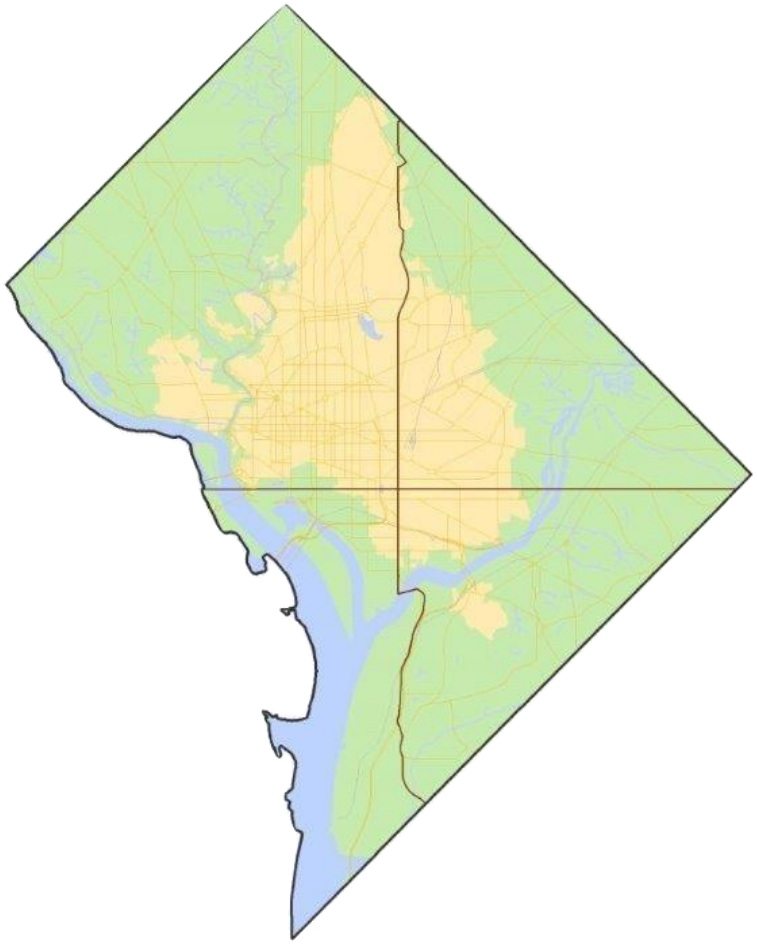
District of Columbia Combined Sewer



- Background – CBP Watershed Model falsely applying CSS disconnects to federal lands, resulting in increasing modeled MS4 loads on federal lands. This is creating challenges in fed agencies meeting their assigned planning goals.
- DC Water can provide data documenting there should be no disconnects on federal lands

Local Nitrogen Planning Goals - Nonwastewater

Agency	2010 No Action	2017 Progress*	Draft Planning Goal	2010 E3	Planning Goal as a % of E3
Agricultural Research Service	1,272	1,328	1,212	775	12%
Department of Defense	12,224	12,388	11,538	6,517	12%
General Services Administration	2,095	2,118	1,965	1,038	12%
National Park Service	37,060	35,287	35,178	22,266	13%
Smithsonian Institution	439	691	430	362	12%
Other Federal Land	130	152	130	80	0%
Nonfederal	146,924	133,830	132,298	71,992	20%
Total	200,143	185,795	182,750	103,030	

* DOEE recognizes 2017 progress does not fully reflect implementation to date. Implemented BMPs should be resubmitted for 2018 progress

Local Phosphorus Planning Goals - Nonwastewater

Agency	2010 No Action	2017 Progress	Draft Planning Goal	2010 E3	Planning Goal as a % of E3
Agricultural Research Service	104	106	83	46	35%
Department of Defense	1,145	1,141	941	588	37%
General Services Administration	141	141	109	57	38%
National Park Service	13,197	4,553	9,128	2,826	39%
Smithsonian Institution	103	112	82	47	37%
Other Federal Land	9	11	9	5	0%
Nonfederal	15,344	10,844	10,701	3,041	38%
Total	30,042	16,908	21,053	6,610	

* DOEE recognizes 2017 progress does not fully reflect implementation to date. Implemented BMPs should be resubmitted for 2018 progress

DC Combined Sewer, con't

- Request – allow combined sewer disconnections to be specified as either:
  - Affecting all agencies in a land-river segment proportionally, or
  - Applying ONLY to non-federal areas of the land-river segment.

- If unspecified, CSS disconnects will be assumed to apply to all agencies.
- If there is insufficient non-fed land to accept the entire disconnect, would be capped at total amount of non-fed land in the land-river segment.
- **NOTE:** loads in these cases would be conserved; option would merely shift load within the same land-river segment