

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

April 12, 2022

Mr. Mark Babbitt, P.E.
Acting Director, Department of Engineering and Technical Services
District of Columbia Water and Sewer Authority
1385 Canal Street SE
Washington DC 20003

Re: Testing and Monitoring for Cured-in-Place-Pipe (CIPP) Activities

Dear Mr. Babbitt:

The Department of Energy and Environment (DOEE), Air Quality Division (AQD), has reviewed the District of Columbia Water and Sewer Authority (DC Water) plans to perform cured-in-place-pipe (CIPP) activities using a hot water curing process and a non-VOC/non-styrene resin in the Soapstone Creek area in the coming months. AQD continues to review whether an air quality permit is required to perform these activities pursuant to 20 DCMR § 200. AQD has been unable to make such a determination based on the currently available information.

DOEE recognizes the need to move forward with this process in order to protect the watershed and human health from ongoing sewer pipe leaks. DOEE is also aware of the limited information available about potential harmful emissions from the chosen process chemistry.

Before AQD can make a determination regarding whether such a process requires an air quality permit, further information must be collected. DOEE is authorizing this project to move forward under the following conditions:

1. Emissions Testing Plan: Pursuant to the authority of 20 DCMR § 502, DOEE is requiring DC Water to develop an emissions testing plan for implementation during the project to determine both the identity and quantity of emissions from the process. The plan shall include procedures for submitting the results of this testing to AQD for review in a timely fashion. The testing plan shall be submitted to AQD for approval at least 30 days prior to initiating any CIPP operations.
2. Site Monitoring Plan: Should a permit be determined to be required, it will be necessary to ensure that DC Water's procedures are adequate to minimize danger to public health and welfare and that the operations are not inimical to the public health and welfare (see 20 DCMR § 201). DC Water must submit a plan to perform and report the results of ambient air monitoring around the site of the operations at least 30 days prior to initiating any CIPP operations. The extent of the monitoring should be sufficient to prove that the maximum downwind concentration of any pollutant released is below associated health thresholds. To ensure the protection of public health, the Site Monitoring Plan should also include the

procedures that DC Water will follow at the time of sampling/operations to address any unhealthy levels of any pollutant identified during such monitoring.

3. Approval of Plans: The plans specified in points 1 and 2 above must be approved by DOEE in advance of CIPP operations commencing, and once approved, must be implemented at the work site(s) according to those plans during CIPP operations.

In addition to the above concerns, outside parties have asserted that there are some circumstances when emissions from this type of process may be inadvertently released into nearby homes or businesses. We understand that DC Water has, or is developing, an outreach plan to notify neighbors of the actions they should take to minimize the potential of being impacted by any such release. Additionally, we understand that DC Water intends to develop and implement a response plan to promptly respond to any complaints from the public during operations. DOEE is requesting confirmation that such plans exist or are being developed and, furthermore, requesting details of these plans as they become available.

I can be reached at (202) 535-1747 or by email at stephen.ours@dc.gov. Please contact me if you have any questions or concerns about the contents of this letter.

Sincerely,



Stephen S. Ours, P.E.
Chief, Permitting Branch
Air Quality Division

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