



April 19, 2022

Stephen S. Ours, PE
Chief, Permitting Branch
Air Quality Division

Dear Mr. Stephen Ours, PE,

DC Water received your letter to Mr. Babbitt dated April 12, 2022, regarding testing and monitoring for CIPP activities.

DC Water agrees to submit Emission Testing and Site Monitoring Plans 30 days prior to initiating cured-in-place pipe (CIPP) operations. Our proposed approach is described below and will also be presented to the Soapstone Valley community at the ANC 3F monthly meeting on Tuesday, April 19, 2022. The approach described below will be refined into the requested Emission Testing and Site Monitoring Plans submitted to DOEE per the schedule required in your letter.

Site Monitoring

We will complete the following activities:

1. Measure background air quality with a photoionization detector (PID) prior to CIPP activities.
2. Establish a 15-foot exclusion zone around the liner insertion point within which only contractors wearing PPE will enter.
3. Monitor air quality with PIDs at exclusion zone perimeter and boundary of closest residence throughout curing process.
4. Monitor air quality with PIDs at intermediate, final, and downstream manholes after completion of CIPP as curing water is released.

Emissions Testing

We will complete the following activities:

1. Collect air samples with summa canisters at the exclusion zone perimeter of the insertion manhole during the curing process. Collect air samples with summa canister at the intermediate, final, and downstream manholes prior to the release of CIPP curing water. The canisters will be sent to a laboratory for constituent identification.
2. Use anemometers to monitor air flow measurements.

Protection against emissions inadvertently released into homes

1. There has been concern expressed that the traps on individual homes may not be adequate to protect against gas in the lateral. This is of particular concern where the trap has run dry and/or has not been properly installed. It should be noted that this concern is not unique to the CIPP lining process.
2. The contractor will plug the manholes to prevent gas migration. The plug will be removed only after CIPP work is complete, the pipe flushed, and the lateral openings have been cut open. For

homes where laterals connect directly to the sewer, the plug will be installed in the cleanout. For homes where a cleanout does not exist, one will be installed.

3. DC Water will distribute a flyer to communicate to homeowners how to fill their traps.

Notification of Neighbors in vicinity of work

1. DC Water will continue its outreach and communication efforts to keep the area residents and ANC informed of schedule as well as sampling results and the flyer mentioned above.

Independence of Testing and Sampling Effort

1. DC Water intends to engage Water Research Foundation (WRF) to oversee independent testing and sampling of air quality. WRF is a non-profit committed to advancing the science of water to improve quality of life. WRF is a research-based organization and will convene an expert panel to review the data and outcomes.

We believe this approach addresses DOEE's concerns and meets the requirements of the requested Emission Testing and Sampling Plans to be formally submitted prior to this CIPP installation. This level of testing for routine CIPP work is unusual in industry. Engaging WRF will help establish an independently verified baseline that can be used.

Sincerely,



William Elledge, PE
Interim Director, Engineering and Technical Services
DC Water