



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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MEMORANDUM

TO: Angie Garcia, US Environmental Protection Agency (EPA) Region III
FROM: Jeff White
RE: Review of the Approval Letters for the 2009 Polychlorinated Biphenyl (PCB) Total Maximum Daily Load (TMDL) Fiscal Year (FY) Submittals
DATE: November 15, 2011

Maryland Department of the Environment (MDE) has reviewed the Approval Letters and Decision Rationales dated March 18, 2011 and March 22, 2011, respectively, for the following TMDLs:

- 1) Total Maximum Daily Load of Polychlorinated Biphenyls in the Northeast River, Tidal Fresh Segment, Cecil County, Maryland (March 22, 2011);
- 2) Total Maximum Daily Load of Polychlorinated Biphenyls in the Bohemia River, Oligohaline Segment, Cecil County, Maryland (March 18, 2011);
- 3) Total Maximum Daily Load of Polychlorinated Biphenyls in the Corsica River of the Lower Chester River, Mesohaline Segment, Queen Anne's County, Maryland (March 22, 2011);
- 4) Total Maximum Daily Load of Polychlorinated Biphenyls in the Sassafra River, Oligohaline Segment, Cecil and Kent Counties, Maryland (March 22, 2011);

Specific Revisions to FY 2009 TMDL Approval Letters and Decision Rationales

Total Maximum Daily Load of Polychlorinated Biphenyls in the Northeast River, Tidal Fresh Segment, Cecil County, Maryland (March 22, 2011):

- In Section III (page 6) and section IV (page 9) of the Decision Rationale, rather than referring to the applicable Wastewater Treatment Plants (WWTPs) in the watershed as "active municipal NPDES permitted facilities", please simply state that there are two "active municipal WWTPs". Reference to "municipal permitted facilities" could include some regulated stormwater discharges as well [i.e., municipal separate storm sewer systems (MS4s)].
- The Maximum Daily Load (MDL) allocations in Table 2 of Section II are incorrect. The total MDL for the embayment is 6.23 grams per day (g/day). The Pennsylvania upstream Load Allocation (LA) is 0.078 g/day, the LA for the Maryland portion of the watershed is 5.372 g/day, the National Pollutant Discharge Elimination System (NPDES) Stormwater Wasteload Allocation (WLA) is 0.147 g/day (this allocation is also incorrect in Table 3), and the margin of safety is 0.623 g/day. The WLA for the WWTPs of 0.009 g/day is the only correct allocation in this table.



Total Maximum Daily Load of Polychlorinated Biphenyls in the Bohemia River, Oligohaline Segment, Cecil County, Maryland (March 18, 2011):

- In Section II (page 2), the last sentence should be revised to state that, “The MDLs were developed based on EPA guidance...”, rather than the “TMDLs were developed based on EPA guidance...”.
- The NPDES Stormwater MDL allocation in Tables 2 and 3 of Section II are incorrect. It should be 0.013 g/day rather than 0.0013 g/day.
- The NPDES permit number for the Cecilton WWTP in Table 3 is incorrect. It should be MD0020443.
- The following statement: “The results indicated that when the site specific water column TMDL endpoint (0.11 ng/L) and the site specific sediment TMDL endpoint (0.18 ng/g) were met, the tPCB sediment concentration was still higher than the site-specific sediment TMDL endpoint (1.5 ng/g)”, which appears in Section III (page 5) and Section IV (page 7), should be revised. The correct statement should read: “The results indicated that when the site specific water column TMDL endpoint (0.18 ng/L) was met, the tPCB sediment concentration was still higher than the site-specific sediment TMDL endpoint (1.5 ng/g)”.

Total Maximum Daily Load of Polychlorinated Biphenyls in the Corsica River of the Lower Chester River, Mesohaline Segment, Queen Anne’s County, Maryland (March 22, 2011):

- In the Approval Letter, the incorrect Integrated Report listing year is provided for the impacts to biological communities impairment. The correct year is 2004. The Approval Letter indicates 2002.
- The NPDES permit number for the Centreville WWTP in Table 3 is incorrect. It should be MD0020834.
- MDE recommends that the reference to the “active municipal NPDES permitted facility WWTP” in Section IV (page 8) be revised, so as to reference solely the “active municipal WWTP”.

Total Maximum Daily Load of Polychlorinated Biphenyls in the Sassafras River, Oligohaline Segment, Cecil and Kent Counties, Maryland (March 22, 2011):

- MDE recommends that the reference to the “active municipal NPDES permitted facilities (Wastewater Treatment Plants (WWTP))” in Section IV (page 8) be revised, so as to reference solely the “active municipal Wastewater Treatment Plants (WWTPs)”.