



CHARLES COUNTY GOVERNMENT  
**Department of Planning & Growth Management**

**Deborah A. Carpenter, AICP**  
Director

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VIA ELECTRONIC MAIL

October 4, 2021

Ms. Jennifer Smith, Program Manager  
Sediment, Stormwater, and Dam Safety Program  
Water and Science Administration  
Maryland Department of the Environment  
1800 Washington Blvd., 4<sup>th</sup> Floor, Suite 440  
Baltimore, Maryland 21230-1708

Re: Charles County Draft NPDES MS4 Permit  
*21-DP-3322 (MD 0068365)*

Dear Ms. Smith:

Charles County staff has reviewed the above referenced draft permit provided by your office at the Maryland Department of Environment on June 11, 2021. Based on that review the following items have been identified that we would like to bring to the Department's attention for further clarification.

1. Part IV.D.4.b. requires the development of a good housekeeping plan for the County-owned properties not required to be covered under Maryland's SW Industrial GP where the activities in Part IV.D.4.a. are performed, including school properties.

The Charles County Government does not own or have authority over school properties, because the Board of Education is an independent entity. Therefore, it appears the requirement for good housekeeping plans on school properties would not apply in Charles County. Please explain the Department's expectations.

2. Part IV.E.4 and 6 and Part IV.G. reference the 2021 Accounting Guidance, however the large Phase I tentative determination permits reference the 2020 Accounting Guidance. Please confirm the correct date for the guidance.
3. Part G.3 states Charles County shall develop a PCB source tracking monitoring plan for all applicable TMDL WLA's where watershed reductions are required to meet water quality standards. Please confirm Charles County does not currently have PCB TMDL WLA's where watershed reductions are required to meet water quality standards.
4. Part VII.C is a new section on Emergency Reporting Requirements and requires that any non-compliance that may endanger human health or the environment must be reported to MDE within 24

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