



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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MEMORANDUM

TO: Angie Garcia, US Environmental Protection Agency Region III
FROM: Jeff White, Maryland Department of the Environment – Science Services Administration
RE: Review of the Approval Letter for the Conowingo Dam/Susquehanna River Watershed
Sediment Water Quality Analysis
DATE: November 1, 2012

Maryland Department of the Environment (MDE) has reviewed the approval letter for the following Water Quality Analysis (WQA):

“Water Quality Analysis of Sediment in the Conowingo Dam/Susquehanna River Watershed, Cecil and Harford Counties, Maryland”.

As a result of this review, the following changes are requested:

Approval Letter

In the 1st paragraph, first sentence, the WQA was actually submitted to the US Environmental Protection Agency (EPA) on September 28, 2011 rather than September 30, 2011 as indicated by the letter.

In the 1st paragraph, the descriptor, “Integrated Report Assessment Unit ID” should precede the basin identification “MD-02120204”, in order to provide clarification. Thus, the first parenthetical in the 2nd sentence should read “Integrated Report Assessment Unit ID: MD-02120204”.

The 2nd sentence of the 1st paragraph should say that the watershed was identified on “Maryland’s 2010 Integrated Report” as impaired rather than “Maryland’s 2010 303(d) List”. The common naming convention, which has been used within Total Maximum Daily Load (TMDL) and WQA reports for the past several years by MDE, is to refer to the “Integrated Report” rather than the 303(d) List.

The last sentence of the 1st paragraph should read “the listing for nutrients is addressed in a separate water quality analysis” rather than “the listing for nutrients will be addressed in a separate water quality analysis”.

The text from the WQA describing 1) the difference between the impounded mainstem of the watershed and the non-tidal streams draining to the mainstem impoundment, and 2) how this distinction relates to the assessment of aquatic life and subsequent assessment of a sediment impairment, within both the Integrated Report and the WQA, should be incorporated at the end of the 1st paragraph.



The 2nd sentence of the 2nd paragraph should indicate that the Integrated Report did not make a determination regarding impairment to aquatic life within the watershed “due to a limited amount of biological monitoring data from the Maryland Biological Stream Survey (MBSS)”. The descriptor “from the MBSS” should be added to the statement to provide an important clarification.

The 2nd sentence of the 2nd paragraph should indicate that the watershed was reassessed in 2011 using additional biological monitoring data “collected by the SRBC using MBSS protocols”. The descriptor “using MBSS protocols” adds important clarification as to why this data was ok to incorporate from the official Integrated Report assessment of aquatic life.

The 3rd sentence of the 2nd paragraph should indicate that the number of biological sampling sites increased from five sites to 15 sites in the “Conowingo Dam/Susquehanna River watershed” rather than solely the “Conowingo Dam/Susquehanna River”. This important clarification relates to the difference in impairment assessments between the mainstem impoundment and the nontidal streams draining to the mainstem impoundment.

