



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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MEMORANDUM

TO: Maria Garcia, EPA Region III
Helene Drago, EPA Region III
FROM: Jeff White, MDE
CC: Lee Currey, MDE; Dinorah, Dalmasy, MDE; Anna Kasko, MDE; Melissa Chatham, MDE
RE: Review of the Approval Letter for the Middle Patuxent River Watershed Sediment WQA
DATE: September 15, 2011

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 Middle Patuxent River Watershed, Howard County, Maryland”.

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

Approval Letter

The approval letter does not mention the primary basis of the sediment WQA at all (i.e., the main rationale for why the watershed is not impaired for sediments). The primary basis of the WQA is that the watershed can not be impaired by elevated sediment loads since it was identified as supporting aquatic life on Maryland’s Integrated Report. The exact phrase on page 7 of the WQA reads as follows: “Since the watershed was identified as supporting aquatic life, a Biological Stressor Identification Analysis (BSID) analysis was not required, and it can be determined that aquatic life can not be impacted by elevated sediment loads”. The approval letter solely focuses on the loading analysis within the WQA, which is provided as a corollary analysis, intended to further the argument that watershed is not impaired for sediments. Specifically, on page 9, in reference to the loading analysis, the WQA reads, “It is applied in this analysis as an indicator, in addition to the biological assessment of the watershed, to determine whether aquatic life is impacted by elevated sediment loads”. MDE recommends that the Environmental Protection Agency (EPA) revise the approval letter to indicate that the biological assessment of the watershed as supporting aquatic life is the primary basis for the determination that the watershed is not impaired for sediments.

In the third paragraph of the approval letter, the Chesapeake Bay Program Phase 5.2 watershed model is abbreviated as “CBP P.5”. The correct abbreviation is “CBP P5.2”.

