



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 Potomac River Lower North Branch 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 Potomac River Lower North Branch, Allegany County, Maryland”.

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

Approval Letter

In the first paragraph, the descriptor, “Integrated Report Assessment Unit ID” should precede the basin identification “MD-02141001”, in order to provide clarification. Thus, the first parenthetical in the 2nd sentence should read “Integrated Report Assessment Unit ID: MD-02141001”.

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. This same revision applies to the text in the first sentence of the 2nd paragraph as well.

Also, in the first sentence of the 2nd paragraph, the Approval Letter incorrectly states that MDE conducted a Biological Stressor Identification Analysis (BSID) analysis to evaluate the Integrated Report sediment impairment in the watershed. This is slightly misleading, as the BSID was conducted to identify stressors causing the impairment to aquatic life, and the results of the analysis were then used to evaluate the sediment impairment identified on the Integrated Report.

The 2nd sentence of the 2nd paragraph should not refer to the “current” sediment stressors, since, as per the BSID analysis, no sediment related stressors were identified. More appropriately here, the text should indicate that no association between “individual sediment stressors” and impaired biological communities was indicated within the BSID analysis.



The 3rd sentence of the 2nd paragraph says the BSID analysis indicates that the biological impairment in the watershed may be caused by a rain-shadow effect. This is not correct. The BSID analysis concludes that the biological impairment in the watershed is (definitive) caused by a rain-shadow effect.

The 4th sentence of the 2nd paragraph should say that MDE compared total suspended solids (TSS) concentrations and benthic macroinvertebrate data from Maryland Department of Natural Resource's (DNR) CORE/TREND monitoring program in order to "evaluate whether or not sediment is impacting aquatic life in the mainstem" of the watershed rather than to simply "evaluate the aquatic life of the mainstem", as indicated by the Approval Letter.

The last sentence of the 2nd paragraph should say that "The analysis indicated that TSS observations..." rather than solely "The analysis indicated that observations...".

