



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029  
8/23/2002

Mr. Robin Grove, Director  
Technical and Regulatory Services Administration  
Maryland Department of the Environment  
2500 Broening Highway  
Baltimore, Maryland 21224

Dear Mr. Grove:

The U.S. Environmental Protection Agency, Region III (EPA) has reviewed the report entitled, "Total Maximum Daily Loads [TMDLs] of Carbonaceous Biochemical Oxygen Demand (CBOD) and Nitrogenous Biochemical Oxygen Demand (NBOD) for Antietam Creek, Washington County, Maryland," submitted by the Maryland Department of the Environment (MDE) for final agency review on December 27, 2001. MDE submitted additional information on March 20, 2002, in response to EPA's comments. Antietam Creek was identified on Maryland's 1996 and 1998 Section 303(d) lists as impaired by nutrients, suspended sediments, and low dissolved oxygen.

EPA has determined that a dissolved oxygen TMDL is not necessary for Antietam Creek at this time, and considers MDE's report as a water quality analysis, based on the following: (1) water quality data collected from Antietam Creek in 1996-1997 indicate that the dissolved oxygen standard is currently being met; and (2) the Hagerstown Fiber Limited Partnership waste water treatment plant (permit number MD0066974), a significant discharger of BOD, is currently off-line.

EPA concurs with MDE's assertion in the report that increased loadings of CBOD and NBOD beyond the current allowable point source loadings and current background conditions in Antietam Creek could lead to a violation of the dissolved oxygen water quality standard. Thus, EPA recommends that MDE retain Antietam Creek on its current 303(d) list for dissolved oxygen. Further, should the Hagerstown Fiber Limited Partnership WWTP return to on-line status in the future, then MDE should resubmit the report as a TMDL for agency review and approval. Also, this water quality analysis does not include the other impairments to Antietam Creek (i.e., nutrients, suspended sediments), which MDE is to address at a later date.



If you have any questions, please contact me at (215)814-5715 or Thomas Henry at (215)814-5752.

Sincerely,

*Signed*

Joseph Piotrowski  
Office of Watersheds  
Water Protection Division

cc: Dr. James George, MDE