

Larry Hogan, Governor Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary Horacio Tablada, Deputy Secretary

DEC 3 1 2018

## **CERTIFIED MAIL**

Mr. Christopher J. Phipps, P.E., Director Anne Arundel County Department of Public Works Heritage Complex 2662 Riva Road Annapolis, Maryland 21401



RE: Permit Modifications for Nutrient and Sediment Performance-based Credit Trading

Dear Mr. Phipps:

The Department has modified the discharge permits in effect for facilities identified in your letters dated August 7, 2018 and November 14, 2018 to implement additional monitoring requirements so these facilities may generate certified credits for water quality trading as provided under COMAR 26.08.11 (including certification of credits for wastewater point sources through permit modification at COMAR 26.08.11.07A(2)). This minor permit modification is being implemented under the authority of COMAR 26.08.04.10C(b), which allows for additional reporting requirements to be implemented as a minor permit modification (with the consent of the permittee).

The effective date for each of the permit modifications is December 31, 2018. The modified permits are listed at the end of this letter.

Please find enclosed the documents that are applicable to each of the modified permits:

- (1) Modified cover page of the discharge permit with the modification date and revised State Discharge Permit Number;
- (2) Appendix with definition and additional monitoring and reporting requirements for nutrient and sediment performance-based credit loads;
- (3) Sample spreadsheet Credit Estimation Form to calculate eligible credit (electronic copy attached in the email);
- (4) Sample Pre-print Discharge Monitor Report (DMR) for Outfall Designation "TRAD-E".
- (5) Responses to your November 19, 2019 comments related to proposed permit modification language. If necessary, requests for additional adjustments to this modification can be considered by the Department.

For calendar year 2018, only the credits generated during or after July 2018 will be eligible for the performance-based trading.

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Please also be advised that DMR entry screens are being revised and a trading-based-outfall designation is being added to each associated DMR. Refer to the enclosed sample DMR page as a reference.

If you have any questions feel free to contact Yen-Der Cheng, Chief of Municipal Discharge Permit at (410) 537-3363. If you have any questions specific to data entry, you may also contact the NetDMR help line at (410) 537-3520. Finally, feel free to contact me at any time at the number below.

## **MODIFIED PERMITS**

Facility Name	State Permit Modification Number	NPDES Permit Number	Modification Effective Date
Annapolis Water Reclamation Facility	12DP0838A	MD0021814	December 31, 2018
Broadneck Water Reclamation Facility	14DP0677A	MD0021644	December 31, 2018
Broadwater Water Reclamation Facility	14DP0813A	MD0024350	December 31, 2018
Cox Creek Water Reclamation Facility	07DP0698A	MD0021661	December 31, 2018
Maryland City Water Reclamation Facility	11DP2393A	MD0062596	December 31, 2018
Patuxent Water Reclamation Facility	11DP0132A	MD0021652	December 31, 2018

Sincerely,

Edwal F. Stone, Program Manager

Wastewater Permit Program

cc: Julie Gowe (through electronic copy)

Arno Laud (through electronic copy)

Mr. Greg Busch (through electronic copy)