Comment Response Document
Regarding the Total Maximum Daily Loads of Polychlorinated Biphenyls in the Elk River Oligohaline and the C&D Canal Oligohaline Tidal Chesapeake Bay Segments in Cecil County, Maryland

The Maryland Department of the Environment (MDE) has conducted a public review of the proposed Total Maximum Daily Load (TMDL) of Polychlorinated Biphenyls (PCBs) in the Elk River Oligohaline and the C&D Canal Oligohaline Tidal Chesapeake Bay Segments in Cecil County, Maryland. The public comment period was open from July 17, 2014 through August 15, 2014. One comment was received from Mr. George Kaplan

Below is a list of commenters, their affiliation, the date comments were submitted, and the number referenced to the comments submitted. In the pages that follow, comments are summarized and listed with MDE's response.

Author	Affiliation	Date	Comment Number
Mr. George Kaplan	**Elk and North East Rivers Watershed Association**	**8/18/2014**	**1-2**

Comments and Responses

Comment 1 – The Commenter suggests that the TMDL document's Executive Summary should be shorted and written for the general public.

Response:

The executive summary for this TMDL document is lengthy because two TMDLs are presented within one document. Additional content is required to summarize TMDLs for both the Elk River and the C&D Canal. Typically only one TMDL is presented per document. MDE chose to address the PCB listings for the Elk River and C&D Canal within one TMDL as the tidal rivers are hydrodynamically connected and a single water quality model could be developed to address the entire system.

While TMDLs are available to the public for review, it is still a scientific document that must be written in a manner necessary to address all technical components of a TMDL. Therefore it cannot be written specifically for a non-scientific audience. The public may request that MDE hold an informational meeting to present the TMDL and address any questions or concerns.

Comment 2 – The Commenter asserts that the omission of the tidal component of PCBs (from the Bay) from the tables in the document is a major omission, as it seemed to be included for the Northeast, Bohemia and Sassafras. Because of this, a reader of the document just looking at the tables would miss the point that the tidal component of PCBs in these river is by far the major source, but orders of magnitude. Even if no TMDL can be assigned to this source, it should be listed there anyway, if only to be consistent with previous TMDL reports.

Response:

In the Northeast, Bohemia and Sassafras PCB TMDLs, where no watershed reduction was applied, the load associated with the "tidal component" was presented in order to provide clarity in demonstrating how the TMDL will be met.
Since a reduction to the watershed load was applied in the Elk River and C&D Canal and presented in the TMDL tables, MDE deemed it not necessary to include the "tidal component". However, a detailed description of the tidal component was included in several sections of the TMDL report to inform the reader on the magnitude and importance of this source. MDE thanks the commenter for bringing this to our attention, and in the future, in order to maintain consistency between PCB TMDLs with or without watershed loadings reductions, the "tidal component" load will not be included in the TMDL tables and a footnote will be placed below the table explaining the significance of the "tidal component".