

207 S Commerce St
Centreville, MD 21617
March 29, 2007

Dr. Ching-Tzone Tien
Maryland Department of the Environment
Water Management Administration
1800 Washington Blvd.
Baltimore, Maryland 21230-1708

re: Application for State Discharge Permit 05-DP-3323

Dear Dr. Tien,

Let me begin by saying that done properly, spray irrigation is a great way to dispose of treated effluent. However, I am against renewal of the discharge permit at increased capacity at the present time.

During the 1999 MDE hearing, the capacity of the spray site was estimated at 361,000 to 647,000 gpd, including a 25% reserve. If you consider the fact that the Town has had to dump some of the stored effluent back into the Corsica River for the last two years, one might conclude that we are perhaps at the low end of the estimated capacity.

In 2005 spray season, the town processed a nine-month average of 370,000 gpd while spraying a nine-month average of 280,000 gpd. Last year, the town processed a nine-month average 270,000 gpd while only spraying a nine-month average of 250,000 gpd. This would explain why there was a need to dump stored effluent back into the river.

If the above spray numbers are converted to annual averages, you will find that we are only spraying less than half of permitted capacity. Why is there such a need to increase capacity right now?

From a high-level, systems point of view that includes soil, crops, storage capacity, and spray equipment, the data show that the system is not working. We already cannot spray what the WWTP can process – we store it and then dump it into the river every March. Increasing the permit level is not going to make the problems with soil, crops, storage capacity, and spray equipment go away.

MDE's Guidelines for Land Treatment of Municipal Wastewaters recommends a 60-day storage capacity for spray irrigation systems. Centreville was approved with a 45-day storage capacity. If the proposed increase is granted, the storage capacity is reduced to 41 days. Considering the Town has had to pump stored effluent back into the river for the last two years, maybe an increase in storage capacity is called for – not an effective decrease.

Here is the scenario that I fear the most:

- We are already near capacity at our spray field.
- Additional capacity is approved under the renewed permit.
- The new allocations are committed to businesses or residences.
- We find out later that we don't really have the capacity.
- The Town imposes a building moratorium.
- The Town gets sued by all of the businesses and residences that were promised capacity.

The other choice is to discharge year-round into the Corsica, which is not an acceptable option.

In conclusion, I am against the renewal of permit Discharge Permit 05-DP-3323 with increased capacity. The decision to increase capacity should be deferred at least one more year until it is shown that the soil, crops, storage capacity, and spray equipment have the proven capability to handle a much greater load for a sustained period of time.

Sincerely Yours,

Daniel B. Worth