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THE TOWN OF CENTREVILLE 101 LAWYERS ROW CENTREVILLE, MD 21617
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December 5, 2023

County Commissioners of Queen Anne's County
James J. Moran, President
Philip L. Dumenil, Vice President
Jack N. Wilson, Jr., Commissioner
J. Patrick McLaughlin, Commissioner
Christopher M. Corchiarino, Commissioner
107 N. Liberty Street
Centreville, MD 21617

RE: Town of Centreville – Wastewater Treatment Plant Expansion

Dear Commissioners:

Thank you for allowing the Town of Centreville time on your November 14 and November 28 meeting agendas to discuss the application for an amendment to the County's Comprehensive Water and Sewer Plan (CWSP). As a result of questions asked during the public hearing and concerns raised either in person or written, the Town would like to provide feedback for further clarification.

The Town of Centreville is currently working through the process with the Maryland Department of the Environment (MDE) to upgrade the current wastewater treatment plant from .542 million gallons per day (MGD) to 1 MGD and to allow for year-round surface water discharge into the Corsica River. Requesting an amendment to the County's CWSP is the initial step in a very long process. Valid comments and concerns were presented during the November 28th public hearing, requesting information on the exact placement of the outfall; what impact may be introduced to the marine and wildlife as well as the ability to swim; and how this will affect the immediate and long-term health of the Corsica River. Until the amendment has been approved, neither the Town, the County, nor MDE will be able to address these questions and concerns. Based on MDE's process, they will not be able to initiate the evaluation process until these amendments are included in the County's CWSP. To make the Commissioner's aware, for every option for disposal of effluent, all of those options would have to be included in the CWSP for MDE to begin considering the process of testing, evaluating data, determining viable options (including outfall point) and permitting. As Mr. Quimby indicated during the November 28th public hearing, 'this is the first step in a very long process'.

As the Commissioners can imagine, the Town would be in a deadlock, with the only option being to upgrade to enhanced nutrient removal (ENR) at the current .542 MGD. This option will not enable the Town to serve any new development inside or outside of town limits. Including this request in the CWSP does not guarantee approval from MDE, it does grant MDE the

authority to begin the testing, evaluating, and permitting process to determine feasibility of the proposed options.

Following the November 28 public hearing, Town staff had the opportunity to speak with a resident of Quail Run to further explain the process. At this time, the Town is planning to hold a Q&A session in January 2024 with residents of Quail Run once an available date has been determined by both parties. In the meantime, the following is a summation of some of the questions and comments submitted during the public hearing, verbally and in writing:

1. How far out into Corsica will the new outfall be?

Once the County has approved the CWSP Amendment, work can start on reviewing available environmental study data, conduct mixing study to determine the size of diffusers, perform an alignment and constructability study, approve initial design, hold a public hearing, and upon final approval issue permit.

2. Has the State signed off on this?

MDE has not signed off on this as it is the official first step in the process, followed by reviews, and a public hearing prior to final approval and sign-off.

3. Does the Town even have a mechanism for funding a new plant?

Yes. The Town currently has funding from the following channels:

- *Bay Restoration Fund (BRF): ~\$14.9M*
- *Congressionally Directed Spending (CDS): ~\$2.155M*
- *ARPA: ~2.5M - \$3.3M*
- *Rural Dev (Commerce): \$500,000*
- *State Grant: \$15M request to be disbursed at \$5M annually over a 3-year period (pending approval)*

4. If the Town ultimately decides to not build a plant, will they be allowed stream discharge 365 days if this amendment is passed?

The amendment to the CWSP does not approve nor authorize the Town to discharge 365 days a year, only MDE can authorize. If the Town is unable to increase the plant capacity, there would be no need to update the currently permitted discharge capacity of .542 MGD.

5. What are the environmental implications for full year discharge and the impact on water quality?

Through MDE's water quality TMDL reports developed for the Corsica River, approved by EPA, allow for full year discharge.

6. Does the Town expect to take over the daily running of the plant, or continue to contract it out to Maryland Environmental Service?

As of July 1, 2023, the Town's Wastewater Treatment facility has been operated and managed by Susquehanna Environmental Services. The current projection is to maintain our contract with Susquehanna until the Town can hire, train, and fully staff the new treatment plant.

- 7. A degraded marine habitat from increased effluent that may result in temperature and salinity changes.**
Those concerns will be addressed with MDE in the next phase.
- 8. Damage to the upper Corsica anadromous fish spawning area and to state designated oyster sanctuaries.**
Those concerns will be addressed with MDE in the next phase.
- 9. Decreased benefit from nutrient uptake that now occurs in the extensive wetland area of the current discharge point if that point is moved to the main channel.**
With the new outfall location, it may still be acceptable to discharge to the current outfall, while remaining within the existing permit limits.
- 10. Increased toxins from pharmaceuticals and microplastics, which are not filtered out by the membrane technology, as discharges increase.**
Such constituents are not currently being targeted for removal at any wastewater treatment plant in the State.
- 11. Does the current permit allow for 100% of the effluent to be surface discharged from Dec 1 – Mar 31?**
The current permit does allow for the Town to stream discharge the current permitted flow of 0.542 MGD during the off -peak discharge season of December 1 through March 31.
- 12. Membrane Availability**
Membranes and system appurtenances in the many different membrane systems available on the market today, do not lack availability.
- 13. Comparable systems**
While Queenstown is not of the same capacity, they do operate an ENR treatment plant and discharge .200 MGD into the Little Queenstown Creek, using membrane technology.
- 14. Swimmable and Fishable impacts.**
Swimming and fishing impacts are typically related to non-point sources. The Town's treatment facility currently meets permitted levels of treatment and does not contribute to the non-swimmable environment.

From State:

- 1. Where will the new Centreville membrane plant be located?**
The new plant will be located at 116 Johnstown Ln, Centreville, MD 21617, which is where the current facility is situated.
- 2. Is this aspirational?**
It is a very necessary approach, but it does come with numerous responsibilities including but not limited to solidifying finances, connecting politically, meeting regulatory requirements, engaging, notifying the public, working with state and local agencies to determine viability, etc... Prior to most of the aforementioned activities commencing the amendment to the CWSP is the first step.

3. Do they have a construction permit and funding?

The Town is currently in the scoping, funding, and discovery phases of the project. The initial draft of the Preliminary Engineering Report (PER) is slated for review by the end of December. The Town has not arrived at the construction permitting phase of the project and does not anticipate those activities to commence until ~late 2024 – early 2025.

4. Where did they (or are they intending to) obtain the pollution credits to go from 0.5+ MGD discharging Dec 1- Mar 31 to 1 MGD, 365 days/year?

The Town intends to maintain the existing spray irrigation field for the currently permitted .542 MGD between Apr 1 – Nov 30, which would not count against our pollution credit. The remainder of the treated effluent, up to 1.0 MGD, is what the Town is proposing will be discharged year-round, which is well below the waste load allocations for the new discharge location.

The Town appreciates the Commissioners' support throughout this process. We are hopeful you will be able to make a decision you are comfortable with, and the Town is happy to provide any additional information you may need to help with that decision.

Sincerely,



Carolyn M. Brinkley
Acting Town Manager